

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?

- 1.1 For the avoidance of doubt, the Council agrees that, based on the discussions at the Stage 1 hearing sessions, it was agreed that the ‘Broad Locations’ are specific site allocations.
- 1.2 Yes, based on the discussions at the Stage 1 hearing sessions (where it was agreed that the ‘Broad Locations’ are specific site allocations), it is considered that Policy LG1 is necessary, justified and effective. The supporting text concisely at para 2.28-3.33 sets out why the policy is considered to be necessary, justified and effective.
- 1.3 The NPPF sets out at paragraph 35 the tests of ‘soundness’, including:
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground*
- 1.4 The approach in LG1 is in particular considered to be ‘justified’ because of the scale of growth proposed in the Broad Locations, which can therefore deliver a significant additional infrastructure and services both for itself and the wider area. Development needs to come forward through a proper and co-ordinated Masterplanned approach (as set out in LG1) that helps to ensure that proposed development delivers significant additional services for both existing and new communities in the area. It is of the utmost importance that essential infrastructure such as sustainable transport, roads, community facilities, open spaces and schools are provided in a timely manner, which LG1 assist with.
- 1.5 The approach in LG1 is also considered to be ‘justified’ because it is deliverable and it is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by statements of common ground. These include joint work with HCC with regard to all the Broad Locations; joint work with DBC in relation to the HGC sites H1-H4 and joint work with Hertsmere Borough Council (HBC) in relation to Broad Location H8. These are set out in:

SADC/ED3 - Statement of Common Ground – St Albans District Council with Hertfordshire County Council

SADC/ED5 - Statement of Common Ground – St Albans District Council with Dacorum Borough Council. This includes:

Conclusion

SADC and DBC both support the approach in SADC's Regulation 19 draft Local Plan to Hemel Garden Communities.

SADC/ED6 - Statement of Common Ground – St Albans District Council with Hertsmere Borough Council. This includes:

Conclusion

SADC and HBC both support the approach in SADC's Regulation 19 draft Local Plan to a growth location near to HBC's boundary at B8 Harper Lane, north of Radlett.

Q2 Where necessary, do the relevant site allocations include a requirement to provide and/or contribute towards new infrastructure for health care and education?

- 2.1 Yes, where necessary, relevant site allocations include a requirement to provide and/or contribute towards new infrastructure for health care and education. This includes, as set out in Part B of the Plan:

Health care - health and medical

H1 – North Hemel

...

Engaged Communities

23. Recreation space and other community facilities, including contributions to health and sports provision within the wider HGC Growth Areas.

H2 – East Hemel North

...

Engaged Communities

22. Recreation space and other community facilities, including a medical centre, sports hub and sports facilities and contributions to health and sports provision within the wider HGC Growth Areas.

H4 – East Hemel South

...

Engaged Communities

24. Recreation space and other community facilities, including contributions to health and sports provision within the wider HGC Growth Areas.

B1 – North St Albans

...

3. A new local centre to provide local services, including Medical Centre and commercial development opportunities.

B2 – North East Harpenden

...

4. A new local centre to provide local services, including Medical Centre and commercial development opportunities.

OS1 – Land to the north of Bricket Wood

...

1. The site is allocated for community uses only – in line with the aims of the St Stephen Neighbourhood Plan. These community uses may comprise:

...

- a new medical centre and / or a relocation of the Scout group*

Education

H1 – North Hemel

...

12. A 3FE primary school, including Early Years provision, to serve the new community and appropriate contributions towards secondary school provision.

...

20. A new local centre, including education facilities and commercial development opportunities; which provide support for, rather than in competition with, existing Woodhall Farm facilities.

H2 – East Hemel North

...

12. A 3FE primary school, including Early Years provision, to serve the new community. An 8FE secondary school to serve the new and existing communities.

...

20. New A new local centre, including education facilities and commercial development opportunities.

H4 East Hemel South

...

11. One new 3FE and one new 2FE primary schools, including Early Years provision, to serve the new community and appropriate contributions towards secondary school provision.

...

22. A new local centre, including education facilities and commercial development opportunities; which provide support for, rather than in competition with, existing Leverstock Green facilities.

B1 – North St Albans

...

2. A 2FE primary school, including Early Years provision, to serve the new and wider community. This should include provision of an all weather playing pitch available for community use.

B2 North St Albans

...

2. A site for and appropriate contributions towards a 2FE primary school, including Early Years provision and an all weather sports pitch available for community use.

B3 – West Redbourn

...

1. A new 2FE primary school, including Early Years provision, to serve the new and wider community.

B4 – East St Albans

...

2. A 2FE primary school, including Early Years provision, to serve the new and wider community.

3. A site for, and appropriate contributions towards, an 8FE secondary school site within nearby Oaklands land ownership fronting onto Hatfield Road.

4. Investment / reinvestment in improved education and training provision and facilities at Oaklands College. A College Development Zone and a Sports and Community Zone have been identified on the policies map and are supported in principle. Community use of sports facilities and playing pitches should be secured by an appropriate mechanism such as a S106 agreement.

B6 West of London Colney

...

1. A site for, and appropriate contributions towards, an 8FE secondary school site within adjoining HCC land ownership.

- 2.2 NB: It is important to note that some of the Key Development Requirements for schools have proposed Main Modifications to make clearer what is required: (eg for H1 – North Hemel it is proposed to be amended to: *A 3FE primary school, site and contributions, including...*). These are set out as proposed Main Modification in SADC/ED85B and SADC/ED85C.

Policy B1 – North St Albans

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

- 1.1 The site boundary of Policy B1 is primarily based on physical features that are readily recognisable and likely to be permanent as long term defensible Green Belt boundaries. These were defined in the Green Belt Review and they are considered to be justified and effective. More details on the approach to defining the Green Belt boundary is set out in answer to Policy B1 - M7I1Q2 below.
- 1.2 There is also a rectangle of land in the northern part, beyond the proposed amended Green Belt boundary, that is proposed for relocated sports pitches. This relocation of sports pitches has been agreed in principle between the landowners, sports pitch

users, Sport England and SADC. This is addressed in the Key Development requirement for B1 at point 4:

Replacement of the displaced playing fields. The replacement playing fields must be an equivalent or better playing field in terms of quantity and quality and delivered prior to commencement of any development on the existing playing field. Sport England will be a statutory consultee on any future planning application that would affect the playing field within this site allocation.

- 1.3 The site was not recommended for further consideration by the Green Belt Review Report (2023) (GB 02.02), however the boundaries as set out are considered to justified and effective and conform to the requirements of NPPF paragraph 148 which states that:

148. When defining Green Belt boundaries, plans should:

...

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 1.4 The need for the site boundary for Policy B1, despite not being recommended for further consideration by the Green Belt Review Report (2023) (GB 02.02) (in more detail at GB 02.03 - Green Belt Review Annex Proforma Report (2023)), is justified with regard to the general need for Green Belt release as set out in 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.*

- 1.5 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 across two proforma assessments (Site Ref M-020 and C-139) on pages 2 to 6 in LPSS 02.04 Green Belt Sites Recommended Broad Location Proformas (2024). This is set out in particular in the Qualitative Assessments:

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

....

This site adjoins St Albans which is a Tier 1 Settlement. It offers a wide range of significant Economic, Environmental and Social benefits including; housing, affordable housing, a 3FE primary school, a significant scale of sustainable transport improvements and jobs.

This site is recommended to progress.

C-139

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

....

The relatively small scale of the site, and being adjacent to other sites, means that it could be brought forward as part of a co-ordinated cluster. If combined with site M-020 they offer a wide range of significant Economic, Environmental and Social benefits including; housing, affordable housing, a 3FE primary school, a significant scale of sustainable transport improvements and jobs.

This site is recommended to progress.

- 1.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.
- 1.7 The site boundary for Policy B1 is also in part justified by the landownership of the Woollams, Trust who have been actively promoting the site and positively responding to the Local Plan at Regulation 18 and 19 stages. That part of the site currently has a live planning application that is seeking to be policy compliant with the draft Local Plan (outline application reference 5/2024/2271).
- 1.8 It can also be noted that the remaining part of the site already has planning permission (outline permission reference 5/2021/0423). The Council's Development Management Committee meeting on 1 September 2025 resolved that reserved matters application 5/2024/1284 should be granted conditional planning permission subject to the completion of a Section 106 agreement.
- 1.9 Overall, the site boundary for Policy B1 is considered to be justified and effective.

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?

What is the justification for the proposed alteration to the Green Belt boundary?

- 2.1 The primary justification is 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.

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

- 2.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 2.3 The Green Belt Review Report GB 02.02 (2023) sets out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3:

4.3 Step 2: Defining Sub-area Boundaries

Given the requirement through paragraph 143 of the NPPF for Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The Stage 2 sub-areas boundaries were defined in line with the general principles used to identify the Strategic Land Parcels in the Stage 1 GBR. However, as Stage 2 sub-areas are smaller than Stage 1 Parcels, a wider range of boundary features had to be used to delineate the sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent. In some locations readily recognisable and permanent boundary features were present but a policy constraint such as a flood zone was closer to the settlement edge and was therefore adopted as the boundary, as development could not take place in the area between the policy constraint and prominent boundary feature.

Permanent and readily recognisable boundary features (both man-made and natural) are listed in the first column of Table 4.2. The additional readily recognisable

boundary features which are not necessarily permanent are listed in the second column of Table 4.2.

Table 4.2 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established, regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and hedgerows
Natural 'buffer' features such as ridgelines	

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds eye' views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).

- 2.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023).
- 2.5 Relevant considerations are also set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024). Pages 29 and 31 set out:

North St Albans

The site is located to the north of St Albans. The northern boundary of the area to be removed from the Green Belt is defined by a hedgerow boundary with open countryside beyond.

...

- *The northern site boundary is defined by a distinct hedgerow and strip of vegetation to the open countryside beyond.*

- 2.6 The site boundary was also considered having regard to GB 04.03 - Green Belt Review Sites and Boundary Study December 2013 (superseded). It set out:

S4: North of St Albans (page 49)

Boundary Review

6.6.6. This land has clearly defined and strong edges in most directions. The urban edge of St Albans lies adjacent to the south and west, together with the hedgerow surrounding part of Woollam Playing Fields. The western edge is defined by the adjacent railway line. Physical features along the northern edge are less definitive. Part of it comprises a continuous hedgerow and the entire length of this proposed edge has recently been planted with young trees, which should, in time, create a clear edge.

6.6.7. Ensuring the establishment of the recent tree planting will be important in creating a clear physical boundary along the northern edge and this could augmented with additional planting to the south. Similar structural landscape planting on the western side of the railway would also help to integrate new development, create continuous habitat with the existing vegetation along this edge and be continuous with the established strip of woodland alongside the industrial estate to the south.

- 2.7 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

Western boundary – Harpenden Road (A1081)

Northern boundary – access road and well-established hedgerow with mature trees

Eastern boundary – Midland Mainline railway line

- 2.8 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

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

- 3.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 3.2 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) and as shown in Policy B1 M7I1Q1.
- 3.3 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

- 3.4 In relation to the specific case in this location, North St Albans, AL3 6DD, the specific localised Green Belt impacts are well understood because of the findings of GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 on pages 282 to 284, relating to sub area 62, 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). It does not meet purpose 4, and performs weakly against purpose 2 and 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.

- 3.5 GB 02.03 on pages 286 to 288, relating to sub area 63a, 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). It does not meet purpose 4, and performs weakly against purposes 2 and 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.

- 3.6 GB 02.03 on pages 310 to 312, relating to sub-area 66, 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). It does not meet purpose 4; and performs weakly against purpose 2, and 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.

- 3.7 GB 02.03 on pages 322 to 324, relating to sub-area 69, states:

Purpose Assessment

Summary

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

- 3.8 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 across two proforma assessments (Site Ref M-020 and C-139) on pages 2 to 6 in LPSS 02.04 Green Belt Sites Recommended Broad Location Proformas (2024) and as set out in Policy B1 M7I1Q1.
- 3.9 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

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

- 4.1 As set out in the Key Development Requirements, the large majority of the use of the built form will be for residential development, which will be a significant contributor to meeting the Standard Method for housing needs in full; or for green infrastructure, which will provide necessary green space for new and existing communities and nature. The mix of other uses has been established through discussion with key statutory bodies and organisations, including HCC, the NHS and Sport England, as well as the landowners. The key engagement to establish the mix of uses has included:
1. *One extra-care facility comprising of 70-80 self-contained units, one 70-80 bed nursing home and 4 supported living units for people with disabilities (these units are included within the indicative dwellings figure).*
 - Uses established through discussion with HCC.
 2. *A 2FE primary school, including Early Years provision, to serve the new and wider community. This should include provision of an all weather playing pitch available for community use.*
 - Uses established through discussion with HCC and Sport England.
 3. *A new local centre to provide local services, including Medical Centre and commercial development opportunities.*
 - Uses established through discussion with the NHS.
- 4.2 There is already planning permission for part of the site (123 net homes). For the rest of the site, development proposals will come forward in a co-ordinated manner through a single planning application for the whole of the rest of the site. This application has gone through an extensive pre-application process in recent years, was the subject of a Planning Performance Agreement and is now a live planning application. The application is explicitly seeking to be policy compliant with the Key Development Requirements set out in the new draft Local Plan.
- 4.3 NB: There are Main Modifications proposed for site B1 North St Albans as set out in SADC/ED85B and SADC/ED85C.

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

- 5.1 Site B1 North St Albans was assessed, along with all other proposed site allocations, through the screening process carried out by SADCs SFRA Level 1 Addendum (2024) (EDH 02.01). The results from the SFRA screening assessment for site B1 are set out in the *Flood Risk Sequential and Exception Test 2024 (SET)*

(SADC/ED64) in Appendix 1 - Sequential Test for Sites Considered for Regulation 19 Allocation:

The site is entirely in fluvial Flood Risk Zone 1. The Surface Water Flood Risk is a small proportion of the site. As such, there is no need to consider alternative sites in Flood Zone 1.

- 5.2 The proportion of the site B1 with surface water flood risk is 4%. As The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) sets out in the conclusions, paragraph 7.3 that:

In terms of the risk of surface water flooding, the SRFA Level 1 Addendum states that 'it is not anticipated that the sequential test for surface water would normally require alternative sites at lower risk to be considered, because the widespread and dendritic nature of surface water flood risk differs conceptually to river and sea flood risk.' and that 'in some circumstances, for example, for relatively small sites that are potentially substantially affected by surface water, alternative sites may be considered.' On this basis the approach to surface water flood risk for larger sites for the sequential test is that this type of flood risk can be managed on site through design and layout, and mitigation measures such as SuDS. It should be noted that surface water flood risk comprises less than 10% at each Broad Location site.

- 5.3 As a site of 54.85 ha North St Albans can therefore be considered suitable to manage surface water flood risk on site.
- 5.4 No groundwater flood risk was identified at this site by the SFRA Level 1 Addendum (2024).
- 5.5 The ecology of site B1 has been taken into account through the Site Selection process, as set out in Green Belt Sites Recommended Broad Location Proformas (2024) (LPSS 02.04) Qualitative Assessment:

A woodland TPO can be found within the site parallel to the south eastern boundary, which is also a an Ancient Woodland, a deciduous woodland Priority Habitat and a County Wildlife Site. The site is within the 100 metres buffer of an archaeological area subject to recording conditions and a landscape conservation area.

- 5.6 The ecology of the site is addressed as set out in Part B – Local Plan Sites (LPCD 02.02) key development requirement item 10:

Development proposals must take appropriate account of the Ancient Woodland, County Wildlife Site, Priority Habitat and trees covered by Tree Preservation Order along the south-east boundary, and the Priority Habitat close to the eastern boundary comprising an area of deciduous woodland

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?

Can a safe and suitable access to the site be achieved?

- 6.1 Yes, it is considered that a safe and suitable to the site can be achieved.
- 6.2 A Transport Impact Assessment (TIA) was completed for the site which informed the Local Plan by considering the impacts of developing the site in transport terms, and what mitigations (if any) are required. This included whether sustainable transport modes can be taken up, given the type of development and its location; whether safe and suitable access to the site can be achieved for all users; and whether any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 6.3 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents in regards to a safe and suitable access.
- 6.4 The TIA for the site in INF 09.06 – Transport Impact Assessment Appendix 1 St Albans 1 (2024) includes:

3. Access Strategy

The site has direct access onto Harpenden Road. A Local Transport Plan (LTP) compliant access strategy allowing safe access for all modes is deliverable.

...

Conclusion

...

An LTP compliant access strategy allowing safe access for all modes is deliverable. The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety. Overall there are 'no showstoppers'.

Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 6.5 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents. HCC also agreed what would comprise the necessary highway improvements and where and how they would be delivered. N.B as set out elsewhere this includes HCCs agreement to some small scale Main Modifications to the highways and public rights of way requirements.

- 6.6 The necessary highway improvements are made clear to users of the Plan in the key development requirements of the site allocation which are set out in LPCD 02.02 – Reg 19 Local Plan Part B (2024) and state:

Key development requirements

...

6. Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.

7. Support for a transport network (including walking and cycling links) and public transport services upgrades / improvements, including off-site improvements to Harpenden Road, Sandridgebury Lane, Valley Road, Ancient Briton junction and King William IV junction, links to St Albans City Centre, station and education; aligned to schemes in the GTPs and LCWIP.

8. Provide pedestrian and cycle links with the part of the site that is delivering 150 homes from planning permission 5/2021/0423.

9. Support for the improvement of the Public Rights of Way network to enable active travel and recreational use to Heartwood Forest and Nomansland Common.

- 6.7 Overall, the key development requirements alongside policies including LG1 – Broad Locations, SP14 – Delivery of Infrastructure and IMP1 – Additional Infrastructure Requirements for Strategic Scale Development are considered sufficiently clear about where and how they would be delivered.

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

- 7.1 Yes, it is considered that Policy B1 is justified, effective and consistent with national planning policy.
- 7.2 As answered above in Policy B1 M7I1Q1, Policy B1 is considered to be justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 7.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy B1 M7I1Q3 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 7.4 As set out in Policy B1 M7I1Q1 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site B1 for potential allocation in the Plan and recommended the site to progress.
- 7.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site B1 for allocation, which states at paragraphs 5.4.35 and 5.4.38:

5.4.35 Green Belt options can be placed into a broad sequential order of preference:

...

5.4.38 Third, is North St Albans strategic urban extension, which comprises agricultural fields to the east of Harpenden Road (and a recently permitted scheme for 150 homes; ref. 5/2021/0423) and north of St Albans Girls School and St Albans Enterprise Centre. Whilst the site is sensitive in Green Belt terms (it is not 'recommended' by the Stage 2 study, as shown in Figure 5.5, but was highlighted through the Green Belt Review Stage 1, as shown in Figure 5.4), there is a considerable growth opportunity, including in respect of delivering a neighbourhood centre and cycle infrastructure. Another consideration is that the land has been surveyed in detail and been found to mainly comprise grade 3a quality land (i.e. the lowest grade classed as best and most versatile, BMV). The assumption is 947 homes (not including the adjacent permitted site for 150 homes) which is slight reduction from the proposal in 2023. The northernmost part of the site (north of a tree belt) would be retained in the Green Belt.

- 7.6 Policy B1 is effective as the Council has engaged with the landowner of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC ED21 - Statement of Common Ground between SADC and Cala Homes
 - SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England
- 7.7 There is planning permission for part of the site, reference 5/2021/0423. This also received a committee resolution to grant permission on Monday 1st September 2025 for the reserve matters subject to completion of a section 106 legal agreement. There is also a live planning application covering the whole of the rest of the B1 allocation that has come through a planning performance agreement process, reference 5/2024/2271.
- 7.8 Policy B1 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01.
- 7.9 Overall, Policy B1 is considered to be justified, effective and consistent with national planning policy.

- 7.10 N.B Policy B1 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy B4 – East St Albans

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

- 1.1 The site boundary of Policy B4 is primarily based on physical features that are readily recognisable and likely to be permanent as long term defensible Green Belt boundaries. These were defined in the Green Belt Review and they are considered to be justified and effective. More details on the approach to defining the Green Belt boundary is set out in answer to Policy B4 M7I1Q2 below.
- 1.2 The site boundary of Policy B4 is considered to be justified and effective.
- 1.3 The primary justification is 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.
- 1.4 Relevant considerations are also set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024). Pages 45, 46 and 47 set out:

East St Albans

The site is located along the eastern edge of St Albans. The northern and eastern site boundaries are defined by Sandpit Lane and North Drive respectively.

...

- *Open North Drive along eastern edge.*

...

- *The site is defined by the existing settlement edge to the north and west, and North Drive provides a logical limit to the extension of development eastwards. In addition, development here would mirror the extent of development on the other (northern) side of Sandpit Lane.*

- 1.5 The site boundary was also considered having regard to GB 04.03 - Green Belt Review Sites and Boundary Study December 2013 (superseded). It set out:

S3: East of St Albans (pages 35-36)

Boundary Review

5.7.8. This land has clearly defined, visually prominent and strong edges to the north and west along the existing settlement edge of St Albans and Sandpit Lane. The boundary to the south would comprise a combination of hedgerows and woodland. The boundary to the east would comprise North Drive, Oaklands College and Home Wood.

5.7.9. While North Drive comprises a clearly define feature on the ground, there would be benefits if this edge is reinforced by additional planting. This would provide structure, form and greater visual separation from the land to the east. Such planting would also potentially add new corridors to the landscape and reduce the potential for fragmentation of existing landscape features, particularly Home Wood.

- 1.6 Policy B4 is considered to be justified as the general need for Green Belt release as set out in 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.*

- 1.7 It is also considered the site boundary is justified with regards to the extent of Green Belt release. For this site in particular, the Green Belt Review assessment found in GB 02.03 - Green Belt Review Annex Proforma Report (2023) on pages 363 to 365, relating to sub-area 77b, states:

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 RC-8.

- 1.8 Also for this site, GB 02.03 on pages 366 to 369, relating to sub-area 77c, states:

Purpose Assessment

Summary

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

- 1.9 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 21 to 23 in LPSS 02.04 Green Belt Sites Recommended Broad Location Proformas (2024). This is set out in particular in the Qualitative Assessment:

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

...

This site adjoins St Albans which is a Tier 1 Settlement. It offers a wide range of significant Economic, Environmental and Social benefits including: housing, affordable housing, a secondary school, a primary school, a significant scale of sustainable transport improvements and jobs.

This site is recommended to progress.

- 1.10 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.
- 1.11 The site boundary of Policy B4 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural

England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:

- SADC/ED15 - Statement of Common Ground between SADC and Oaklands College & Taylor Woodrow
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
- SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
- SADC/ED23 - Statement of Common Ground between SADC and Historic England
- SADC/ED24 - Statement of Common Ground between SADC and Natural England

1.12 Overall, the site boundary for Policy B4 is considered to be justified and effective.

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?

What is the justification for the proposed alteration to the Green Belt boundary?

2.1 The primary justification is 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.

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

2.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 2.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3:

4.3 Step 2: Defining Sub-area Boundaries

Given the requirement through paragraph 143 of the NPPF for Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The Stage 2 sub-areas boundaries were defined in line with the general principles used to identify the Strategic Land Parcels in the Stage 1 GBR. However, as Stage 2 sub-areas are smaller than Stage 1 Parcels, a wider range of boundary features had to be used to delineate the sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent. In some locations readily recognisable and permanent boundary features were present but a policy constraint such as a flood zone was closer to the settlement edge and was therefore adopted as the boundary, as development could not take place in the area between the policy constraint and prominent boundary feature.

Permanent and readily recognisable boundary features (both man-made and natural) are listed in the first column of Table 4.2. The additional readily recognisable boundary features which are not necessarily permanent are listed in the second column of Table 4.2.

Table 4.2 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established, regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and hedgerows
Natural 'buffer' features such as ridgelines	

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds eye' views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately

as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).

- 2.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 77b, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundaries are readily recognisable and likely to be permanent. The outer boundaries are predominantly readily recognisable but not necessarily permanent. If the subarea was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.

Categorisation & Recommendation

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.

- 2.5 GB 02.03 goes on to state other potential Green Belt boundary considerations for this site relating to sub-area 77c, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundary is readily recognisable and likely to be permanent. The outer boundaries are readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.

Categorisation & Recommendation

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.

- 2.6 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – Sandpit Lane

Southern boundary – Oaklands College buildings

Eastern boundary – footpath and cycleway / unclassified private road

- 2.7 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

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

- 3.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 3.2 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) and as shown in Policy B4 M7I1Q1.
- 3.3 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

- 3.4 In relation to the specific case in this location, East St Albans, AL4 9JJ, the specific localised Green Belt impacts are well understood because of the findings of GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023), as set out above in Policy B4 M7I1Q1.
- 3.5 As set out in Policy B4 M7I1Q1 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site B4 for potential allocation in the Plan and recommended the site to progress.
- 3.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q4 How have the risks from flooding been considered as part of the site's allocation, having particular regard to surface water flooding?

- 4.1 Site B4 East St Albans was assessed, along with all other proposed site allocations, through the screening process carried out by SADCs SFRA Level 1 Addendum (2024) ((EDH 02.01). The results from the SFRA screening assessment for site B4 are set out in the *Flood Risk Sequential and Exception Test 2024 (SET)* (SADC/ED64) in Appendix 1 - Sequential Test for Sites Considered for Regulation 19 Allocation:

The site is entirely in fluvial Flood Risk Zone 1. The Surface Water Flood Risk is a small proportion of the site. As such, there is no need to consider alternative sites in Flood Zone 1.

- 4.2 The proportion of the site B4 with surface water flood risk is 1%. As The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) sets out in the conclusions, paragraph 7.3 that:

In terms of the risk of surface water flooding, the SRFA Level 1 Addendum states that 'it is not anticipated that the sequential test for surface water would normally require alternative sites at lower risk to be considered, because the widespread and dendritic nature of surface water flood risk differs conceptually to river and sea flood risk.' and that 'in some circumstances, for example, for relatively small sites that are potentially substantially affected by surface water, alternative sites may be considered.' On this basis the approach to surface water flood risk for larger sites for the sequential test is that this type of flood risk can be managed on site through design and layout, and mitigation measures such as SuDS. It should be noted that surface water flood risk comprises less than 10% at each Broad Location site.

- 4.3 As a site of 21.69 ha East St Albans can therefore be considered suitable to manage surface water flood risk on site.
- 4.4 No groundwater flood risk at a depth of less than 0.025m was identified at this site by the SFRA Level 1 Addendum (2024).

Q5 Is Policy B4 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 5.1 Yes, it is considered that Policy B4 is justified, effective and consistent with national planning policy.
- 5.2 As answered above in Policy B4 M7I1Q1, Policy B4 is considered to be justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024).
- 5.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy B4 M7I1Q1 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).

- 5.4 As set out in Policy B4 M7I1Q1 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site B4 for potential allocation in the Plan and recommended the site to progress.
- 5.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site B4 for allocation, which states at paragraph 5.4.35 and 5.4.39:

5.4.35 Green Belt options can be placed into a broad sequential order of preference:

...

Fourth, is East St Albans strategic urban extension, which comprises a series of agricultural fields adjacent to the northwest of Oaklands College (the landowner), to the south of Sandpit Lane and east of a recent urban extension. The Green Belt situation is as per North St Albans, but a benefit of this site is the potential to deliver a secondary school as well as a primary school, which led to a conclusion in 2023 that this is a sequentially preferable site to North St Albans. It should also be noted that this was a proposed strategic allocation in the previous version of the St Albans Local Plan as withdrawn in 2020.

- 5.6 Policy B4 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Update response to Local Plan Reg 19:
- SADC/ED15 - Statement of Common Ground between SADC and Oaklands College & Taylor Woodrow
 - SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
- 5.7 Policy B4 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01.
- 5.8 Overall, Policy B4 is considered to be justified, effective and consistent with national planning policy.
- 5.9 N.B Policy B4 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy B5 – Glinwell, Hatfield Road

Q1 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?

What is the justification for the proposed alteration to the Green Belt boundary?

- 1.1 The primary justification is 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.

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?

- 1.2 Yes, it is considered that the proposed boundary alteration is consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 1.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3:

4.3 Step 2: Defining Sub-area Boundaries

Given the requirement through paragraph 143 of the NPPF for Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The Stage 2 sub-areas boundaries were defined in line with the general principles used to identify the Strategic Land Parcels in the Stage 1 GBR. However, as Stage 2 sub-areas are smaller than Stage 1 Parcels, a wider range of boundary features had to be used to delineate the sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent. In some locations readily recognisable and permanent boundary features were present but a policy constraint such as a flood zone was closer to the settlement edge and was therefore adopted as the boundary, as development could not take place in the area between the policy constraint and prominent boundary feature.

Permanent and readily recognisable boundary features (both man-made and natural) are listed in the first column of Table 4.2. The additional readily recognisable boundary features which are not necessarily permanent are listed in the second column of Table 4.2.

Table 4.2 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established, regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and hedgerows
Natural ‘buffer’ features such as ridgelines	

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps ‘birds eye’ views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).

- 1.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 84, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

If the sub-area was released, it would result in the creation of new Green Belt boundaries. These boundaries would be predominantly readily recognisable but not necessarily permanent and would not meet the NPPF definition. The new boundaries would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs moderately against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released in combination with SA-92, 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 combination with SA-92 as RC-9.

- 1.5 Also for this site, potential Green Belt boundaries were considered in GB 02.03 relating to sub-area 92, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundary to the west of the sub-area is readily recognisable and likely to be permanent. The outer boundaries to the east and north of the sub-area are readily recognisable and likely to be permanent. The outer boundary to the south is readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs strongly against the 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-37 (including a small strip of Green Belt land along the A1057 Hatfield Road to the north of the sub-area) or in combination with SA-84 as RC-9.

- 1.6 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – Hatfield Road (A1057)

Eastern boundary – Station Road

Southern boundary – Alban Way, footpath and cycleway (former railway line)

- 1.7 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 2.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.

- 2.2 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) which sets out in paragraph 7.2 that:

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.*

- 2.3 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

- 2.4 In relation to the specific case in this location, Glinwell, Hatfield Road, St Albans, AL4 0HE, the specific localised Green Belt impacts are well understood because of the findings GB 02.02 Green Belt Review (2023) and GB 02.03 Green Belt Review Annex Proforma Report (2023). The Green Belt Review assessment of this site is comprised of multiple sub-area proforma assessments in this location. GB 02.03 on pages 400 to 402, relating to sub-area 84, states:

Purpose Assessment

Summary

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

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 combination with SA-92, is unlikely to significantly

harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs moderately against NPPF purposes and makes a less important contribution to the wider Green Belt. If the sub-area is released in combination with SA-92, 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 combination with SA-92 as RC-9.

- 2.5 GB 02.03 on pages 432 to 434, relating to sub-area 92, 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). It does not meet purposes 2 or 4; 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 its release in isolation or in combination with SA-84 would not harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against the 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-37 (including a small strip of Green Belt land along the A1057 Hatfield Road to the north of the sub-area) or in combination with SA-84 as RC-9.

- 2.6 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 24 to 26 in LPSS 02.04 Green Belt Sites Recommended Broad Location 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.

- 2.7 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q3 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?

Can a safe and suitable access to the site be achieved?

- 3.1 Yes, it is considered that a safe and suitable to the site can be achieved.
- 3.2 A Transport Impact Assessment (TIA) was completed for the site which informed the Local Plan by considering the impacts of developing the site in transport terms, and what mitigations (if any) are required. This included whether sustainable transport modes can be taken up, given the type of development and its location; whether safe and suitable access to the site can be achieved for all users; and whether any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 3.3 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents in regards to a safe and suitable access.
- 3.4 The TIA for the site in INF 09.02 – Transport Impact Assessment Appendix 1 2024 Colney Heath 1 (2024) includes:

3. Access Strategy

The site has direct access onto Station Road and Hatfield Road. Suitable access and cycle access/improvements to the A1057 Hatfield Road or mixed pedestrian and cycle use will be required and suitable access and improvements to the Alban Way walking and cycle route will need to be provided. There is a reasonable prospect that a Local Transport Plan (LTP) compliant access strategy allowing safe access for all modes is deliverable.

Conclusion

...

There is a reasonable prospect that an LTP compliant access strategy allowing safe access for all modes is deliverable.

The Comet Model Forecast shows that traffic impacts generated from the site and cumulative traffic in the area can be mitigated to a degree that can be acceptable regarding the NPPF test of 'severe' regarding congestion and safety.

Overall there are 'no showstoppers'.

Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?

- 3.5 It is important to note that HCC as the Highway Authority and Transport Authority directly contributed to all the TIAs and agreed the contents. HCC also agreed what would comprise the necessary highway improvements and where and how they would be delivered. N.B as set out elsewhere this includes HCCs agreement to some small scale Main Modifications to the highways and public rights of way requirements.
- 3.6 The necessary highway improvements are made clear to users of the Plan in the key development requirements of the site allocation which are set out in LPCD 02.02 – Reg 19 Local Plan Part B (2024) and state:

Key development requirements

- 1. Suitable access and cycle access / improvements to the A1057 Hatfield Road. Pedestrian and cycle provision will be required and suitable access and improvements to the Alban Way walking and cycle route will need to be provided, including lighting where appropriate. Direct access from the site to the Alban Way must be provided to enable and prioritise use of the Alban Way.*
- 2. Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. Including but not limited to lighting / surfacing improvements to the Alban Way and traffic calming and junction improvements on Hatfield Road.*
- 3. Consideration of horse-riders in any access / connectivity work and support for provision of a link between Oakland College's land north of Hatfield Road and the bridleway network to the south and east of the site.*

- 3.7 Overall, the key development requirements alongside policies including LG1 – Broad Locations, SP14 – Delivery of Infrastructure and IMP1 – Additional Infrastructure Requirements for Strategic Scale Development are considered sufficiently clear about where and how they would be delivered.
- 3.8 NB: It can additionally be noted that the Agent acting on behalf of the landowner has submitted a Transport Assessment that concludes that a safe and suitable access to the site be achieved

Q4 Is any development proposed in areas at risk from flooding? If so, what is the justification for this?

- 4.1 No, there is no development proposed in areas at risk from flooding. Site B5 Glinwell was assessed, along with all other proposed site allocations, through the screening process carried out by SADCs SFRA Level 1 Addendum (2024) (EDH 02.01). The results from the SFRA screening assessment for site B5 are set out in the *Flood Risk*

Sequential and Exception Test 2024 (SET) (SADC/ED64) in Appendix 1 - Sequential Test for Sites Considered for Regulation 19 Allocation:

The western side of the site is within Flood Zones 2 and 3 and the development type is 'More Vulnerable'. The Surface Water Flood Risk cover a significant proportion of the site. The Exception Test is required.

- 4.2 The SET shows 2% of the site is within Flood Zone 2 and 11% within Flood Zone 3a.
- 4.3 The *Flood Risk Sequential and Exception Test 2024 (SET) (SADC/ED64)* in Appendix 2 - Exception Test sets out for site B5:

The site is predominantly in Flood Zone 1. Development can be restricted to Flood Zone 1, following a sequential approach to layout and a proportionate reduction in the quantum of housing deliverable on site.

The Surface Water Flood Risk should be managed through approaches set out in the SFRA L2 recommendations.

The site will also support the delivery of sustainable growth in the context of SADC having a large need for new delivery of new housing and will therefore meet the District's wider sustainability objectives.

There is no need to consider alternative sites in Flood Zone 1.

- 4.4 The key development requirements in the Reg 19 Local Plan Part B (2024) (LPCD 02.02) set out that:

A small part of the site is within Flood Zone 3 alongside Butterwick Brook and development proposals must fully take account of this, with no built form in this area. There must be no residential development outside Flood Zone 1 and the Exception Test is required for this site as the western side of the site is within Flood Zones 2, 3a and 3b and the development type is 'More Vulnerable'. The site is also at risk of surface water and groundwater flooding.

- 4.5 The proportion of the site B5 with surface water flood risk is 5%. As The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) sets out in the conclusions, paragraph 7.3 that:

In terms of the risk of surface water flooding, the SRFA Level 1 Addendum states that 'it is not anticipated that the sequential test for surface water would normally require alternative sites at lower risk to be considered, because the widespread and dendritic nature of surface water flood risk differs conceptually to river and sea flood risk.' and that 'in some circumstances, for example, for relatively small sites that are potentially substantially affected by surface water, alternatives sites may be considered.' On this basis the approach to surface water flood risk for larger sites for the sequential test is that this type of flood risk can be managed on site through design and layout, and mitigation measures such as SuDS. It should be noted that surface water flood risk comprises less than 10% at each Broad Location site.

- 4.6 As a site of 20.85 ha Glinwell can therefore be considered suitable to manage surface water flood risk on site.
- 4.7 Groundwater flood risk at a depth of less than 0.025m was identified across 29% of this site by the SFRA Level 1 Addendum (2024). This area of groundwater flood risk is within the 10.78 ha (47%) of the total site area of 22.9 ha not due to be built on.
- 4.8 NB: It can additionally be noted that the Agent acting on behalf of the landowner has set out that “No built development is proposed within the flood plain as shown on the indicative Master Plan work which accompanied the Reg 18 and 19 submissions”.

Q5 Is Policy B5 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 5.1 Yes, it is considered that Policy B5 is justified, effective and consistent with national planning policy.
- 5.2 Policy B5 is justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024) and as shown in Policy B5 M7I1Q2.
- 5.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy B5 M7I1Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 5.4 As set out in Policy B5 M7I1Q2 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site B5 for potential allocation in the Plan and recommended the site to progress.
- 5.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site B5 for allocation, which states at paragraph 5.4.35 to 5.4.36:

5.4.35 Green Belt options can be placed into a broad sequential order of preference:

5.4.36 A starting point is Glinwell, Hatfield Road strategic urban extension, located at the far eastern edge of St Albans (Smallford). Land here primarily comprises a series of glasshouses (Glinwell Plc), with an area of greenspace to the west (associated with a stream, known as Butterwick Brook). Land here is recommended for further consideration by the Green Belt Review and there is the potential to deliver a strategic scale scheme (436 homes), although it would not deliver a primary school. Another factor in support of development is the previously developed nature of the majority of the site; however, on the other hand, this also leads to challenges, including given the value of the existing greenhouses. Beyond this there are other challenges associated with growth here (see Section 9). However, on balance, the

option of growth here is considered to be the best performing Green Belt release option at St Albans. A final consideration is the need to consider the site alongside the possibility rationalising built form across the adjacent community of Smallford, including noting the consultation response from Nottcutts (ref 910).

- 5.6 Policy B5 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED16 - Statement of Common Ground between SADC and Glinwell PLC
 - SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England
- 5.7 Policy B5 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01.
- 5.8 Overall, Policy B5 is considered to be justified, effective and consistent with national planning policy.
- 5.9 N.B Policy B5 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M3 – Bedmond Lane

Q1 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?

What is the justification for the proposed alteration to the Green Belt boundary?

- 1.1 The primary justification is 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.

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?

- 1.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 1.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3:

4.3 Step 2: Defining Sub-area Boundaries

Given the requirement through paragraph 143 of the NPPF for Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The Stage 2 sub-areas boundaries were defined in line with the general principles used to identify the Strategic Land Parcels in the Stage 1 GBR. However, as Stage 2 sub-areas are smaller than Stage 1 Parcels, a wider range of boundary features had to be used to delineate the sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent. In some locations readily recognisable and permanent boundary features were present but a policy constraint such as a flood zone was closer to the settlement edge and was therefore adopted as the boundary, as development could not take place in the area between the policy constraint and prominent boundary feature.

Permanent and readily recognisable boundary features (both man-made and natural) are listed in the first column of Table 4.2. The additional readily recognisable boundary features which are not necessarily permanent are listed in the second column of Table 4.2.

Table 4.2 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established, regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and hedgerows
Natural ‘buffer’ features such as ridgelines	

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps ‘birds eye’ views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).

- 1.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 55, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundary and majority of outer boundaries are readily recognisable and likely to be permanent. The short outer boundary to south is recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundary would not meet the NPPF definition. The new boundary would require strengthening.

Categorisation & Recommendation

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 in isolation, it would result in the designation of a similar strength boundary compared to the existing inner Green Belt boundary. The new boundary to the south would require strengthening to ensure it is readily recognisable and likely to be permanent. Recommended for further consideration as RA-31.

- 1.5 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

Western boundary – Bedmond Lane

Northern boundary – Hemel Hempstead Road (A4147) and King Harry Lane

Southern boundary – Short belt of well-established hedgerow and mature trees

- 1.6 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 2.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 2.2 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), which sets out in paragraph 7.2 that:

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.*

- 2.3 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

- 2.4 In relation to the specific case in this location, Bedmond Lane, St Albans, AL3 4AH, the specific localised Green Belt impacts are well understood because of 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 253 to 255, relating to sub-area 55, 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). It does not meet purpose 2, and performs weakly against purpose 4 and strongly 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, 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 in isolation, it would result in the designation of a similar strength boundary compared to the existing inner Green Belt boundary. The new boundary to the south would require strengthening to ensure it is readily recognisable and likely to be permanent. Recommended for further consideration as RA-31.

- 2.5 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 28 to 30 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.

- 2.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q3 How has the scale and quantum of development been determined, having particular regard to archaeological and ecological constraints?

- 3.1 The scale and quantum of development has been determined by giving particular regard to the archaeological and ecological constraints and therefore proposing a significantly reduced dwelling capacity, in comparison to the capacity position if those constraints were not present.

- 3.2 These constraints are well-known and understood and are reflected in the Key Development Requirements:

4. The known archaeological information suggests that the northern third of the site is particularly sensitive in heritage terms. Development proposals should avoid new buildings in this part of the site, and should better reveal the significance of the below-ground heritage assets.

5. Development proposals must take appropriate account of all those trees protected under Tree Preservation Order.

6. Proposals must take account of the presence of the Lizard Orchid which is a protected species on Schedule 8 of the Wildlife and Countryside Act 1981.

7. Built development should avoid the relatively rare species-rich grassland in the northern part of the site

- 3.3 These Key Development Requirements include directly addressing the Heritage Impact Assessment of the site, as set out in EDH 04.07 - Heritage Impact Assessment Appendix 6 High-Level HIAs by Place Services (2024).

- 3.4 Overall, the site area is 5.84 Hectares in size. The SADC approach to calculating site dwelling capacity has been carried out on a consistent basis, as set out in HOU 01.02 – SADC Housing Land Supply, Windfall and Housing Capacity Evidence Paper (2024). This includes:

7. Housing capacity

7.1. The indicative residential capacity calculations for the majority of sites were informed by the approach in the Council's Housing and Economic Land Availability Assessment (HELAA) report 2021/3 and Urban Capacity Study 2022 (UCS)4. The calculations for the Green Belt site allocations are in accordance with the "Estimating Development Potential of Housing Sites" section of the HELAA report (paragraphs 3.29 – 3.34).

...

7.4. For the Green Belt sites, justification for the assumption of 40 dwellings per hectare (dph) density is set out in the HELAA report (paragraph 3.30), with reference to the Council's previous Residential Density Report 2014. The 40dph is consistent and does not change to account for different density of adjacent development, in order to ensure efficient use of land and to minimise the amount of Green Belt land that is released. This is in line with the approach in the NPPF 2023 which sets out that, where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

7.5. HELAA report paragraphs 3.31 – 3.33 justify the gross to net ratio used for different sizes of site, to which the 40dph calculation is applied, and Table 1 sets this out as follows:

Table 1: Gross to net ratio

Site Area (hectares)	Gross to net ratio
Sites up to 0.4ha	100%
Sites between 0.4 to 2ha	85%
Sites greater than 2ha	60%

7.6. In terms of the 'Site Area' to use for the Table 1 calculations; the area of some of the allocation sites was reduced to take account of required infrastructure or constraints to development potential, through planning judgment, in line with the approach in HELAA report para's 3.37-3.39. Such constraints may include trees, flood zones, setting of heritage assets, other physical characteristics of a site.

- 3.5 The standard SADC approach for a site of this size would therefore be a 60/40 gross to net ratio and 40 dph on the residential parcel, which would have generated a capacity of 140 homes. However, given the constraints, the Council has taken a cautious view on the capacity. The assumed site area has been halved to 2.92 Hectares, with the standard gross to net ratio of 60/40 and 40 dph on the residential parcel, which gives a capacity of 70 homes. This is considered to be a cautious estimate and the capacity may turn out to be somewhat higher, but this seems to be the most reasonable position at this point in time.
- 3.6 Indicative Masterplanning work by the landowner / developer team, as set out in their draft Local Plan Regulation 19 response (ID215), shows that the 70 home capacity can be readily accommodated on the site, whilst fully according with the Key Development Requirements.
- 3.7 Further work with regard to archaeology and ecology by the landowner/developer team is ongoing. This includes archaeological trial trenching in September 2025. All evidence to date supports the capacity being at least the 70 homes set out above.
- 3.8 It can be noted that the site capacity was 78 homes at the draft Local Plan Regulation 18 stage, but with caution in mind, SADC reduced the capacity for the draft Local Plan Regulation 19 stage.

Q4 Is Policy M3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 4.1 Yes, it is considered that Policy M3 is justified, effective and consistent with national planning policy.

- 4.2 Policy M3 is justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024) as shown in Policy M3 M7I1Q2.
- 4.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M3 M7I1Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 4.4 As set out in Policy M3 M7I1Q2 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site M3 for potential allocation in the Plan and recommended the site to progress.
- 4.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site M3 for allocation, which states at paragraph 5.4.35 and 5.4.37:

5.4.35 Green Belt options can be placed into a broad sequential order of preference:

...

5.4.37 Second, there are four non-strategic sites recommended by the GB Review, of which three are strongly supported and one gives rise to some concerns (Bedmond Lane):

...

• Bedmond Lane (70 homes) – is located at the western edge of the city, again well linked to the town centre (via Verulamium Park). This is a sensitive site from a biodiversity and historic environment perspective, with some significant objections received through consultation in 2023, and the land is designated as an Asset of Community Value. With regards to biodiversity, the site is not shown as priority habitat by the nationally available dataset but is understood to comprise valued chalk grassland habitat and supports legally protected Lizard Orchid. With regards to the historic environment, the northern third of the site is sensitive in terms of archaeology, to the extent that this is likely a constraint to development, i.e. archaeology should remain in situ. Also, two significant footpaths pass through the site, linking the town and Verulamium Park to the countryside. However, much detailed work has been undertaken, and there is confidence in the potential to deliver homes in a way that avoids impacts to the most sensitive parts of the site and delivers benefits. Site capacity has been reduced from 78 homes.

- 4.6 Policy M3 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19

- SADC/ED23 - Statement of Common Ground between SADC and Historic England
- SADC/ED24 - Statement of Common Ground between SADC and Natural England

- 4.7 Policy M3 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01.
- 4.8 Overall, Policy M3 is considered to be justified, effective and consistent with national planning policy.
- 4.9 N.B Policy M3 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M8 – Verulam Golf Club

Q1 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?

What is the justification for the proposed alteration to the Green Belt boundary?

- 1.1 The primary justification is 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.

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?

- 1.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 1.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3:

4.3 Step 2: Defining Sub-area Boundaries

Given the requirement through paragraph 143 of the NPPF for Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The Stage 2 sub-areas boundaries were defined in line with the general principles used to identify the Strategic Land Parcels in the Stage 1 GBR. However, as Stage 2 sub-areas are smaller than Stage 1 Parcels, a wider range of boundary features had to be used to delineate the sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent. In some locations readily recognisable and permanent boundary features were present but a policy constraint such as a flood zone was closer to the settlement edge and was therefore adopted as the boundary, as development could not take place in the area between the policy constraint and prominent boundary feature.

Permanent and readily recognisable boundary features (both man-made and natural) are listed in the first column of Table 4.2. The additional readily recognisable boundary features which are not necessarily permanent are listed in the second column of Table 4.2.

Table 4.2 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established, regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and hedgerows
Natural 'buffer' features such as ridgelines	

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds

eye' views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).

- 1.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 103, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner and outer boundaries are predominantly partially readily recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries would meet the NPPF definition.

Categorisation & Recommendation

Sub-area category & recommendation

The sub-area performs weakly against NPPF purposes and makes a partly 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. Partly recommended for further consideration as RA-39.

- 1.5 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – London Road (A1081)

Eastern boundary – golf club private access road and golf club buildings and car park

South-western boundary – footpath and well-established hedgerow and mature trees.

- 1.6 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 2.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 2.2 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), which sets out in paragraph 7.2 that:

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.*

2.3 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

2.4 In relation to the specific case in this location, Verulam Golf Club, St Albans, AL1 1JG, the specific localised Green Belt impacts are well understood because of the findings of GB 02.01 Green Belt Review (2024) and GB 02.03 Green Belt Review Annex Proforma Report (2023). GB 02.03 on pages 478 to 480, relating to sub-area 103, states:

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 does not meet purpose 2, and performs weakly against purposes 3 and 4.

Wider Green Belt Impacts

Summary

Overall, the northern section of the sub-area does not play an important role with respect to the strategic land parcel, and if released in isolation 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 partly 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. Partly recommended for further consideration as RA-39.

- 2.5 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 31 to 33 in LPSS 02.06 Green Belt Sites Recommended Medium & Small 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.

- 2.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q3 Is Policy M8 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 3.1 Yes, it is considered that Policy M8 is justified, effective and consistent with national planning policy.
- 3.2 Policy M8 is justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024) as shown in Policy M8 M7I1Q2.
- 2.7 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M8 M7I1Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 3.3 As set out in Policy M8 M7I1Q2 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site M8 for potential allocation in the Plan and recommended the site to progress.
- 3.4 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site M8 for allocation, which states at paragraph 5.4.35 and 5.4.37:

5.4.35 Green Belt options can be placed into a broad sequential order of preference:
• *Verulam Golf Club (65 homes) – benefits from very good proximity to the town centre. A detailed representation from the site promoter suggests the potential for 85 homes, and this is shown in the photo montage below. The montage also shows two*

permitted schemes (shown as white) and the northern part of the golf course. The golf course is notably in two parts, with the southern half more wooded and sensitive in biodiversity and heritage terms, as the former parkland of Sopwell House.

- 3.5 Policy M8 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England
- 3.6 Policy M8 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01.
- 3.7 Overall, Policy M8 is considered to be justified, effective and consistent with national planning policy.
- 3.8 N.B Policy M8 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M18 North-East of Austen Way

Q1 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?

What is the justification for the proposed alteration to the Green Belt boundary?

- 1.1 The primary justification is 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.

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?

- 1.2 Yes, the proposed boundary alteration is considered to be consistent with paragraph 148 e) and f) which states:

148. When defining Green Belt boundaries, plans should:

...

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 1.3 The Green Belt Review Report GB 02.02 (2023) set out a clear approach to defining sub-area boundaries based on NPPF paragraph 143. (N.B The Green Belt Review Report GB 02.02 refers to NPPF paragraph 143 based on the NPPF 2021. This is the same as the NPPF paragraph 148 in the 2023 version). This is set out in section 4.3:

4.3 Step 2: Defining Sub-area Boundaries

Given the requirement through paragraph 143 of the NPPF for Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The Stage 2 sub-areas boundaries were defined in line with the general principles used to identify the Strategic Land Parcels in the Stage 1 GBR. However, as Stage 2 sub-areas are smaller than Stage 1 Parcels, a wider range of boundary features had to be used to delineate the sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent. In some locations readily recognisable and permanent boundary features were present but a policy constraint such as a flood zone was closer to the settlement edge and was therefore adopted as the boundary, as development could not take place in the area between the policy constraint and prominent boundary feature.

Permanent and readily recognisable boundary features (both man-made and natural) are listed in the first column of Table 4.2. The additional readily recognisable boundary features which are not necessarily permanent are listed in the second column of Table 4.2.

Table 4.2 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines	Prominent physical/topographical features, e.g. embankments
Canals	Existing development with strongly established, regular or consistent boundaries
Rivers and waterbodies	Well-established woodland edges, tree belts and hedgerows
Natural 'buffer' features such as ridgelines	

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds eye' views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).

- 1.4 Potential Green Belt boundaries were considered in the Green Belt Review Proforma Annex Report GB 02.03 (2023). For this site, relating to sub-area 77a, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner boundaries are readily recognisable and likely to be permanent. The outer boundaries are predominantly readily recognisable but not necessarily permanent. If the sub- area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.

Categorisation & Recommendation

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.

- 1.5 There is effectively one new proposed Green Belt boundary in the Plan, which is:

Eastern boundary – well-established woodland/tree belt.

- 1.6 Overall, it is considered that the proposed boundary alteration will not need to be altered at the end of the Plan period, and has clearly defined boundaries using physical features that are readily recognisable and likely to be permanent.

Q2 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 2.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 2.2 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), which sets out in paragraph 7.2 that:

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.*

- 2.3 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

- 2.4 In relation to the specific case in this location, North East of Austen Way, St Albans, AL4 0XH, the specific localised Green Belt impacts are well understood because of 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 359 to 361, relating to sub-area 77a, states:

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.

- 2.5 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 2 to 4 in LPSS 02.06 Green Belt Sites Recommended Medium & Small 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.

- 2.6 Overall, the site selection work concluded that the site was recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in this location.

Q3 How has the effect of development on the setting of designated heritage assets been considered, having particular regard to the Grade II listed buildings at Kay Walk?

- 3.1 The effect of development on the setting of designated heritage assets been considered through the undertaking of a Heritage Impact Assessment; this had particular regard to the Grade II listed buildings at Kay Walk.
- 3.2 The strategy for undertaking Heritage Impact Assessments for certain sites was summarised in EDH 04.01 - Heritage Impact Assessment Draft Cover Report (2024).pdf as follows:

2. Background

2.1. Prior to the Regulation 18 Draft Local Plan Consultation, which ran from July to September 2023, the Council identified that a number of the proposed site allocations could impact on the historic environment by affecting the setting of nearby heritage assets. At that stage it had not provided site-specific HIAs as part of its evidence base, but the intention was for these to be undertaken to a proportionate degree ahead of the Regulation 19 Plan.

2.2. The Regulation 18 Consultation Historic England (HE) response concurred with the Council's intention to produce proportionate site-specific HIAs to inform the Regulation 19 Plan. HE advised that the purpose of the HIAs will be to identify any heritage assets which could be affected by development of a given site, to consider their significance (including any contribution made by their setting), and assess the impact that any proposed development might have on the significance of those assets. HE suggested that the best way to explore options for mitigation is through the preparation of site-specific HIAs; particularly for large strategic sites or sites where there are particularly significant heritage issues e.g. highly graded heritage asset either on site or in close proximity. HE made clear that it is a question of proportionality; the bigger the site or the more important the heritage issues, the more evidence they would expect to see.

2.3. Through ongoing dialogue with HE it was established that a total of 52no. of the Regulation 19 allocation sites should be subject to the Council's Heritage Impact Assessment 2024, and the Council appointed Essex Place Services to undertake the longer and more detailed assessments. The proportionate approach agreed with HE resulted in the following HIA work being undertaken:

...

b) High-Level Heritage Impact Assessments undertaken by Essex Place Services for the following 18no. sites...

...

M18 - North East of Austen Way, St Albans, AL4 0XH

- 3.3 As such, this site was one of the 18no. sites subject of High-Level HIAs undertaken by Essex Place Services, recognising the potential heritage impact of the allocation. This HIA is included within EDH 04.07 - Heritage Impact Assessment Appendix 6 High-Level HIAs by Place Services (2024).

- 3.4 The HIA's Recommendations/Mitigation section in relation to built heritage reads as follows:

If the potential Allocation progresses, detailed discussions with the Local Planning Authority should be undertaken at an early stage as appropriate, with a detailed Heritage Impact Assessment defining the impact on all heritage assets within proximity to the Site required at planning application stage.

The proposed Allocation has the potential to remove the last remaining parts of the setting of the two listed buildings. Should the Allocation proceed, future applications should explore and minimise this harm through the retention of open space to the north and west of the listed buildings with built form located to the northeast of the Site. Mitigation should include an appropriate landscaping scheme however it is unlikely that mitigation alone would be sufficient to reduce harm.

- 3.5 It is considered that heritage protection in line with the above is suitably secured through the requirement in Policy LG4 o) and the allocation Key development requirement 3; as follows:

LG4 – Large, Medium and Small Sites The Council has allocated sites to support growth that are smaller in size and scale than the Broad Locations. These sites are set out in Part B. Proposals on these sites (or unallocated windfall development at this scale) must accord with the following requirements in addition to the site-specific requirements listed in Part B:

...

o) For sites listed in Appendix 5, development proposals must be informed by a detailed Heritage Impact Assessment and where applicable Archaeological Desk-Based Assessment which address the recommendations of the Council's Heritage Impact Assessment 2024.

Key development requirements

3. The layout of development should minimise any harm to the setting and significance of the Grade II Listed buildings at no's 4 and 5 Kay Walk; this should include the incorporation of appropriate set backs of development.

- 3.6 Taking the above into account, the effect of development on the setting of designated heritage assets has been appropriately considered through the undertaking of a Heritage Impact Assessment; this had particular regard to the Grade II listed buildings at Kay Walk.

Q4 Is Policy M18 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 4.1 Yes, it is considered that Policy M18 is justified, effective and consistent with national planning policy.
- 4.2 Policy M18 is justified as the general need for Green Belt release as set out in GB 01.01 - Green Belt and Exceptional Circumstances Evidence Paper (2024) as shown in Policy M18 M7I1Q2.
- 4.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M18 M7I1Q2 the Green

Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).

- 4.4 As set out in Policy M18 M7I1Q2 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site M18 for potential allocation in the Plan and recommended the site to progress.
- 4.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site M18 for allocation, which states at paragraph 5.4.35 and 5.4.37:

5.4.35 Green Belt options can be placed into a broad sequential order of preference:

5.4.37

...

• North East of Austen Way (37 homes; N.B. previously “east of Kay Walk”) – access is challenging and there is some biodiversity sensitivity, noting onsite priority habitat and an adjacent ancient woodland LWS, but the site is well contained in the landscape, and very close to primary and secondary schools.

- 4.6 Policy M18 is effective as the Council has engaged with the landowner(s) of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment Agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England
 - SADC/ED24 - Statement of Common Ground between SADC and Natural England
- 4.7 Policy M18 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024) and LPCD 03.01.
- 4.8 Overall, Policy M18 is considered to be justified, effective and consistent with national planning policy.
- 4.9 N.B Policy M18 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C

Policy P2 – Land at North Orbital Road

Q1 What is the current use of the site and is it available for development within the plan period?

- 1.1 The site is primarily in use as retail. The front of the site facing the North Orbital A414 contains ancillary car parking and a mixture of class E retail uses comprising an aquatics store, Pets at Home, Costa Coffee, Wenzel's the Bakers, Loaf and a garden shed supplier with sheds stored outside on display. To the East of the site contains a building comprising a mix of further Class E uses, comprising Domino's Pizza, a Dentist, Giant St Albans Bicycle Shop, a trade/retail counter - Central Tool Hire and a site manager's dwelling. The rear of the site contains further ancillary car parking and open storage, with planning permission granted ref 5/2024/1831 dated 24/12/2024 to expand the aquatics store to include an outdoor mini golf course.
- 1.2 The site is available for development within the plan period, as has been confirmed by the landowner/developer through their regulation 19 representation (ref 84), which sets out:

The site currently contains a number of existing uses and buildings and these have leasehold arrangements in place. However, over the next five years these leases will draw to a close and the site is expected to be available for redevelopment in the next five years. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure.

- 1.3 Following further recent correspondence in summer 2025 with the landowner's Agent, they have reconfirmed that completions would likely start well within the plan period, approximately commencing in 2031/2032.

Q2 What is the justification for not seeking to amend the Green Belt boundary in this location? Can the allocation be deliverable whilst retained in the Green Belt? Is the allocation effective?

What is the justification for not seeking to amend the Green Belt boundary in this location?

- 2.1 The site is in existing retail use with associated car parking. As such the site is identified as Previously Developed Land within the Green Belt. The site can therefore be developed without amending the Green Belt boundary.
- 2.2 The site does not adjoin an existing urban area. The Council's approach is to avoid punching holes in the Green Belt, which is an effect that would be created if the site were to be removed from the Green Belt.

Can the allocation be deliverable whilst retained in the Green Belt?

- 2.3 Yes, it is considered that the allocation can be delivered whilst being retained in the Green Belt.
- 2.4 The site was assessed through the site selection process with the details set out in the Green Belt Sites Recommended PDL Site Proformas (2024) (LPSS 02.07). The qualitative assessment states that:

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

The site is adjacent to London Colney, the Tier 3 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt, but it is predominantly brownfield. It is within both the 250 and 400 metres Green Belt Study settlement buffers.

The site is approximately; 1.3 kilometres from a primary school, 1.6 kilometres from a secondary school, 540 metres from a bus stop, 3.4 kilometres from St Albans City railway station and 1.3 kilometres from a Local Centre.

The site is within the 100 metres buffer of a listed building. Adjacent to the west of the site is a deciduous woodland Priority Habitat. The site is also within the 100 metres buffer of other deciduous woodland Priority Habitats towards the north, north-west, west and south of the site. Mature trees border the site at the east, north and west.

A Strategic Flood Risk Assessment Level 2 was undertaken for this site.

Potential access is via the North Orbital Road (A414).

Part of this site received planning permission for residential use (ref 5/2022/0789).

The site is recommended to progress.

- 2.5 NB: in reviewing the Green Belt Sites Recommended PDL Site Proformas (2024) (LPSS 02.07) as part of this answer, it has become apparent that there is a minor error in part of the reference quoted above at:

The site is adjacent to London Colney, the Tier 3 Settlement in the Settlement Hierarchy

- 2.6 The site is not adjacent to London Colney. This minor error does not change the overall assessment or the overall approach to the site set out by the Council.

Is the allocation effective?

- 2.7 Yes, the allocation is considered to be effective. It is not considered that the retention of the Green Belt classification of this PDL site will prevent development from coming forward for development.

Q3 Is Policy P2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

3.1 Yes, it is considered that Policy P2 is justified, effective and consistent with national planning policy.

3.2 Policy P2 is justified as the general need for Green Belt release as set out in 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.*

3.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. For this site in particular, the Green Belt Review assessment found in GB 02.03 - Green Belt Review Annex Proforma Report (2023) on pages 465 to 467, relating to sub-area 100, states:

Purpose Assessment

Summary

The sub-area does not meet any of the purposes overall.

Wider Green Belt Impacts

Summary

Overall, the sub-area does not play an important role with respect to the strategic land parcel, however its release in isolation or in combination would harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area does not meet the NPPF purposes however it makes an important contribution to the wider Green Belt. Not recommended for further consideration.

3.4 The Council's Approach to Green Belt PDL is set out in LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024):

The Local Plan seeks to make the most effective and efficient use of land in the District and has undertaken an extensive and rigorous search for Previously Developed Land (PDL) (also known as 'Brownfield land' in national policy) within existing built-up areas. The approach has been underlain by the concept of 'leaving no stone unturned' in the search for appropriate sites on brownfield land. This extensive search has also included potential PDL opportunities in the Green Belt. However, an insufficient supply of Previously Developed Land led to the requirement to identify sites on Green Belt Land.

- 3.5 The Site Selection process set out in LPSS 02.07 - Green Belt Sites Recommended PDL Site Proformas (2024) assessed site P2 for potential allocation in the Plan and recommended the site to progress. This is set out in particular in the Qualitative Assessment:

The site is not recommended for further consideration by the Green Belt Review Stage 2 Report.

The site is adjacent to London Colney, the Tier 3 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt, but it is predominantly brownfield. It is within both the 250 and 400 metres Green Belt Study settlement buffers.

...

The site is recommended to progress.

- 3.6 NB: As set out above at 2.5 and 2.6, in reviewing the Green Belt Sites Recommended PDL Site Proformas (2024) (LPSS 02.07) as part of this answer, it has become apparent that there is a minor error in part of the reference quoted above at:

The site is adjacent to London Colney, the Tier 3 Settlement in the Settlement Hierarchy

- 3.7 The site is not adjacent to London Colney. This minor error does not change the overall assessment or the overall approach to the site set out by the Council.
- 3.8 Policy P2 is effective as the Council has engaged with the landowner of the site and has continued joint working as appropriate with relevant bodies including, HCC, the Environment agency, Historic England and Natural England. This is set out in the agreed Statements of Common Ground / EA Updated response to Local Plan Reg 19:
- SADC/ED3 - Statement of Common Ground between SADC and Hertfordshire County Council
 - SADC/ED65 – Appendix 7.2: Environment Agency updated response to Regulation 19
 - SADC/ED23 - Statement of Common Ground between SADC and Historic England

- SADC/ED24 - Statement of Common Ground between SADC and Natural England

- 3.9 Policy P2 is consistent with national policy as set out in the evidence base in its totality, including in particular the Green Belt Review, the Site Selection process LPSS 01.01 - Local Plan Site Selection Methodology Outcomes and Site Allocations (23 Sep 2024).
- 3.10 Overall, Policy P2 is considered to be justified, effective and consistent with national planning policy.
- 3.11 N.B Policy P2 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policies UC6 (Sutton Road and Pickford Road, UC7 (Spencer Street), UC11 (Victoria Street), UC19 (Lemsford Road), UC28 (New Greens Residents Association), UC35 (Market Depot, Drovers Way) and UC57 (Telford Court, Alma Road)

Q1 Are the 'Urban Settlement' sites within St Albans justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 1.1 Yes, it is considered that the 'Urban Settlement' sites within St Albans are justified, effective and consistent with national planning policy.
- 1.2 These site allocations are justified because they follow the submitted Plan's spatial strategy which locates growth to make the most sustainable use of land in urban areas and develop brownfield land. The sites are in the settlement of St Albans which is a Tier 1 Settlement in the submitted Local Plan Settlement Hierarchy. Table 1.3 – Settlement Hierarchy in LPCD 02.01 - Reg 19 Local Plan Part A (2024) on page 10 sets out:

Tier 1

City / Large town

Largest population size Sub regional centre for employment and high-order services such as secondary education, retail and leisure Offers choice and variety of sustainable transport provision and connectivity by mainline train

- 1.3 These site allocations are effective as they are developable over the plan period. These sites progressed to site selection as they were indicated as being available for development over the plan period by the respective landowner(s). Correspondence from landowners have reiterated their position that the sites remain available for development within the plan period.
- 1.4 These site allocations are consistent with national planning policy as they enable the delivery of sustainable development in accordance with policies in the NPPF

December 2023. The relevant policies for sustainable development which applies are:

11. Making effective use of land

123. ... Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

124. Planning policies and decisions should: ... c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).

125. Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.

- 1.5 Relevant evidence for site availability, suitability and deliverability is set out in the table below.

Table 1 - Evidence of Site Availability, Suitability and Deliverability for 'Urban Settlement' sites within St Albans

Site Number	Site Allocation Reference	Location	Tenure	Site Availability	Site Suitability (Extracted from LPSS 02.15 - Urban Sites Recommended UCS Proformas (2024))	Site Deliverability (Details of site work to actively progress the site)	Years Deliverable/ Developable
1	UC6	13-19 Sutton Road & 5-11a Pickford Road, St Albans, AL1 5JH	Private	Landowner has confirmed their intention to re-develop the site with the exclusion of 11 and 11a Pickford Road. Further details set out at M7I1Q2.	Page 8: Qualitative Assessment ... <i>The site is within the urban area of St Albans, a Tier 1 Settlement in the Settlement Hierarchy. The site is within the 100 metres buffer of a listed building. The north east corner of the site is slightly within the 100 metres buffer of a County Wildlife Site. Within the centre of the site are a couple of mature trees and another is adjacent to the north site boundary. Potential access is via Sutton Road and the current access route of Pickford Road. The site is recommended to progress.</i>	Active project – Landowner has responded recently (summer 2025) to state that they are currently in the process of selling the site to a housing developer (with the exclusion of 11 and 11a Pickford Road) and therefore confirm that there is a strong likelihood of housing delivery at this site by 2030/31.	2033/34 - 2034/35 NB: SADC taking a more conservative view than the landowners
2	UC7	5 Spencer Street, St Albans, AL3 5EH	Private	Developer's Reg 19 representation (Ref 166) sets out: ... development at the site has been subject to pre-application discussions dating back to 2022 and is subject to ongoing discussions via a Planning Performance Agreement.	Page 9: Qualitative Assessment ... <i>The site is within the urban area of St Albans, a Tier 1 Settlement in the Settlement Hierarchy. The whole site is within a conservation area and is adjacent to a few listed buildings. The site is within the 100 metres buffer of several other listed buildings and locally listed buildings. The whole site is also within an archaeological area subject to recording conditions. Potential access is via Spencer Street, Cross Street or Upper Dagnall Street. The site is recommended to progress.</i>	Developer active project with PPA signed with developer in September 2024 and a current live application for full permission for a residential development of 52 dwellings	2028/29 – 2030/31
3	UC11	50 Victoria Street, St Albans, AL1 3HZ	Private/ SADC	SADC owns rear car parking to facilitate access to the rear of the site. SADC site work shows no	Page 11: Qualitative Assessment ... <i>The site is within the urban area of St Albans, a Tier 1 Settlement in the Settlement Hierachy. The whole site is within a conservation area, it contains a locally listed building and is within the 100 metres buffer of several others. The whole</i>	Private landowner has responded recently (summer 2025) to state that they considered that there was a realistic prospect for	2036/37 NB: SADC taking a more conservative view than the

Site Number	Site Allocation Reference	Location	Tenure	Site Availability	Site Suitability (Extracted from LPSS 02.15 - Urban Sites Recommended UCS Proformas (2024))	Site Deliverability (Details of site work to actively progress the site)	Years Deliverable/ Developable
				overriding constraints. Privately owned part of the site is currently in active use as nightclub (5/2014/2610)	<i>site is also within an archaeological area subject to recording conditions. A mature tree is adjacent to the east site boundary. Potential access is via New Kent Road. The site is recommended to progress.</i>	development of this property in the next 5 years.	private landowners
4	UC19	50-54 Lemsford Road St Albans, AL1 3PR	Private	Awaiting a response from the landowner to confirm further development of the site	Page 14: Qualitative Assessment ... <i>The site is within the urban area of St Albans, a Tier 1 Settlement in the Settlement Hierarchy. The whole site is within a conservation area. The site contains a locally listed building and is within the 100 metres buffer of several others. The south east site boundary is adjacent to an area of woodland and there are four individual TPOs within the site. A Strategic Flood Risk Assessment Level 2 was carried out for this site. Potential Access is via Lemsford Road. The site is recommended to progress.</i>	Developer active project with pre-application advice for 54 homes and planning permission for 2 homes granted to R/O 50 Lemsford Road (5/2024/1499)	2033/34 – 2035/36
5	UC28	New Greens Residents Association, 2 High Oaks, St Albans, AL3 6DL	SADC	SADC site work shows no overriding constraints	Page 19: Qualitative Assessment ... <i>The site is within the urban area of St Albans, a Tier 1 Settlement in the Settlement Hierarchy. The site is adjacent to a couple of mature trees. Potential access is via High Oaks or Partridge Road. The site is recommended to progress.</i>	SADC active project with Pre-application advice given in 2025 for 10 homes	2029/30
6	UC35	Market Depot, Drovers Way, St Albans, AL3 5FA	SADC	SADC site work shows no overriding constraints	Page 24: Qualitative Assessment ... <i>The site is within the urban area of St Albans, a Tier 1 Settlement in the Settlement Hierarchy. The whole site is within a conservation area and is within the 100 metres buffer of two listed buildings and several locally listed buildings. The whole site is also within an archaeological area subject to recording conditions. Potential access is via Drovers Way or Russell Avenue. The site is recommended to progress.</i>	SADC active project with pre-application advice for 11 homes – currently on pause	2033/34

Site Number	Site Allocation Reference	Location	Tenure	Site Availability	Site Suitability (Extracted from LPSS 02.15 - Urban Sites Recommended UCS Proformas (2024))	Site Deliverability (Details of site work to actively progress the site)	Years Deliverable/ Developable
7	UC57	Telford Court, Alma Road, St Albans, AL1 3BP	SADC	SADC site work shows no overriding constraints.	Page 34: Qualitative Assessment ... <i>The site is within the urban area of St Albans, a Tier 1 Settlement in the Settlement Hierarchy. The whole site is within a conservation area. A small area in the south western corner of the site is within the 100 metres buffer of a listed building. The site is also adjacent to two locally listed buildings and is within the 100 metres buffer of several others. Strips of undesignated mature trees/woodland can be found along most site boundaries, with another couple of mature trees within the site. A Strategic Flood Risk Assessment Level 2 was carried out for this site. Potential access is via Alma Road. The site is recommended to progress.</i>	SADC active project with pre application advice for 99 homes	2032/33

Q2 What is the justification for the site boundary at Sutton Road and Pickford Road (UC6)? Can the site be developed in the manner envisaged?

What is the justification for the site boundary at Sutton Road and Pickford Road (UC6)?

- 2.1 The site boundary is considered to be justified due to the site progressing through site selection LPSS 02.15 - Urban Sites Recommended UCS Proformas (2024) which indicated that the site was suitable. The relevant extract is on P8 and set out below:

Qualitative Assessment ... The site is within the urban area of St Albans, a Tier 1 Settlement in the Settlement Hierarchy. The site is within the 100 metres buffer of a listed building. The north east corner of the site is slightly within the 100 metres buffer of a County Wildlife Site. Within the centre of the site are a couple of mature trees and another is adjacent to the north site boundary. Potential access is via Sutton Road and the current access route of Pickford Road. The site is recommended to progress.

- 2.2 The site boundary is also considered to be justified due site being entirely within the land ownership of the single landowner who is actively working to take the site forward. The landowner has reconfirmed their intent to develop the site for residential dwellings in summer 2025 in line with draft policy UC6, with the exclusion of 11 and 11a Pickford Road.

Can the site be developed in the manner envisaged?

- 2.3 Yes, it is considered that the site will be developed in the manner envisaged. Small Main Modifications are proposed that would amend the boundary to exclude both 11 and 11a Pickford Road and to adjust the site capacity accordingly.
- 2.4 The site area has been revised from 0.32 ha to 0.23 ha and the capacity has been revised from 29 to 21 dwellings (indicative). Details are set out via the proposed Main Modifications at SADC/ED85B and SADC/ED85C.