

Matter 7 – Residential Site Allocations

Issue 2 – Harpenden and Hatching Green Site Allocations

Policy B2 – North East Harpenden

Q1 What is the site boundary based on and is it justified and effective? What is expected of development proposals within the area retained as Green Belt?

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

- 1.1 The site boundary of Policy B2 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 B2 M7I2Q2 below.
- 1.2 The site also contains land proposed to be retained within the Green Belt, which equates to roughly 11.5 ha of the overall 43.61 ha site area.
- 1.3 The site boundary of Policy B2 is considered to be justified and effective.
- 1.4 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.
- 1.5 Relevant considerations are also set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024). Pages 35, 37 and 38 set out:

B2 – North East Harpenden, AL5 5EG

The site is located to the northeast of Harpenden. The site's eastern boundary is defined by Common Lane, and Bower Heath Lane to the northwest. The southern boundary abuts the existing settlement edge comprising residential housing estates.

...

- The existing settlement of Harpenden, comprising residential housing and a school abuts the site southern edge.*

...

- The site wraps around the existing settlement edge and consumes Greenacres Equestrian Centre and appears to coalesce with the settlement at Sauncey Wood. To the north, the new development edge conditions will require careful consideration to conserve and enhance the distinct cluster of pastoral fields and hedgerows that provide the setting to the properties along Bower Heath Lane.*

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boundary was also considered having regard to GB 04.03 - Green Belt Review Sites and Boundary Study December 2013 (superseded).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

S6: Northeast of Harpenden (page 63)

Boundary Review

8.6.7. It is concluded that the most appropriate land for release from Green Belt designation is the southern and western part of the sub-area.

8.6.8. This land has clearly defined edges in most directions. The urban edges of Harpenden lie adjacent to the south and west, together with Lower Luton Road (B653). The majority of the eastern edge comprises Common Lane. The northern boundary is the weakest; while sections are formed by established hedgerows, other parts comprise fences.

8.6.9. Structural landscape / hedgerow planting along the northern edge of the proposed area would create a clearer edge, help to integrate new development and provide more separation from the landscape to the north.

- 1.7 Policy B2 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.*

- 1.8 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 126 to 128, relating to sub-area 24, states:

Purpose Assessment

Summary

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

Wider Green Belt Impacts

Summary

Overall, the south-east part of the sub-area does not play an important role with respect to the strategic land parcel, and its release in isolation or in combination with SA-27 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 the south-east part of the subarea makes a less important contribution to the wider Green Belt. If the south-east part of the sub-area only is released, the new inner Green Belt boundary would not meet the NPPF definition. The new boundary would require strengthening. Recommended for further consideration for partial release in isolation as RA-17 or in combination with SA-27 as RC-3.

- 1.9 Also for this site, GB 02.03 on pages 136 to 140, relating to sub-area 27, states:

Purpose Assessment

Summary

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

Wider Green Belt Impacts

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released in isolation or in combination with the south-eastern part of SA-24 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, it would result in the creation of new Green Belt boundaries, which would require strengthening to ensure they are readily recognisable and likely to be permanent. Recommended for further consideration in isolation as RA-18; or in combination with the south-eastern part of SA-24 as RC-3

- 1.10 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out on pages 7 to 9 in LPSS 02.04 Green Belt Sites Recommended Broad Location 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 adjoins Harpenden which is a Tier 2 settlement. The site, with sites C-253 and C-048, 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.

- 1.11 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.
- 1.12 The site boundary of Policy B2 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/ED14 - Statement of Common Ground between SADC and Crest Nicholson
 - SADC/ED18 - Statement of Common Ground between SADC and Sauncey View Lodge
 - SADC/ED19 - Statement of Common Ground between SADC and Trustees of Simmons Trust and Mr & Mrs Wimms
 - SADC/ED27 - Statement of Common Ground between SADC and Miller Homes
 - SADC/ED4 - Statement of Common Ground between SADC and Central Bedfordshire Council
 - 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
- 1.13 Overall, the site boundary for Policy B2 is considered to be justified and effective.

What is expected of development proposals within the area retained as Green Belt?

- 1.14 This is addressed in the Local Plan Part B Key development requirements as:
- 3. On-site outdoor sports provision (which could be within the part of the site remaining in the Green Belt) to meet the additional needs generated by the development should be provided. An offsite facility may be acceptable where justified by evidence and subject to early delivery of the offsite provision prior to occupation of first home.*
- 1.15 There has been an evolving Masterplan for the whole B2 site that has been in place for several years. All of the relevant landowners have been involved in discussions

over the Masterplan as a group and collectively with SADC. More recently, SADC has given formal pre-application advice, including on that evolving Masterplan, to the landowners for the large majority of the site.

- 1.16 Crest Nicholson (rep 266) described in their Regulation 19 response the situation at:

7.8 Crest Nicholson is committed to working collaboratively with neighbouring landowners and promoters to achieve the Council's aspirations for North East Harpenden. Crest are well progressed with discussions with the neighbouring landowners and promoters, and have engaged with both the Council and Hertfordshire County Council towards a joint masterplan approach.

7.9 In progressing a collaborative approach with all other landowners / promoters, a Joint Illustrative Masterplan (Appendix 2) has been developed between all parties.

- 1.17 They further address in that representation directly the land to be retained in the Green Belt at:

Retention of the open land to the north within the Green Belt, with potential for outdoor sports facilities

- 1.18 The illustrative Masterplan is in line with the Key development requirements and as can be seen below, includes sports pitches, allotments and public open space.



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).
- 2.5 The site boundary was also considered having regard to GB 04.03 - Green Belt Review Sites and Boundary Study December 2013 (superseded). This is set out in Policy B2 M7I2Q1.
- 2.6 Relevant considerations are also set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024). This is set out in Policy B2 M7I2Q1.
- 2.7 There are effectively three new proposed Green Belt boundaries in the Plan, which are:

 Northwestern boundary – Bower Heath Lane (B652)
 Northern boundary – Unclassified private road leading to Common Lane
 Eastern boundary – Common Lane
- 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 the 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 B2 M7I2Q1.

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.

3.4 In relation to the specific case in this location, North East Harpenden, AL5 5EG, 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 B2 M7I2Q1.

3.5 As set out in Policy B4 M7I2Q1 above, the Site Selection process set out in LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024) assessed site B2 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 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 and 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 (these units are included within the indicative dwellings figure).*

– Uses established through discussion with HCC.

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.*

- 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 As set out in answer to Q1 above, Crest Nicholson (rep 266) described in their Regulation 19 response the situation at:

7.8 Crest Nicholson is committed to working collaboratively with neighbouring landowners and promoters to achieve the Council's aspirations for North East Harpenden. Crest are well progressed with discussions with the neighbouring landowners and promoters, and have engaged with both the Council and Hertfordshire County Council towards a joint masterplan approach.

7.9 In progressing a collaborative approach with all other landowners / promoters, a Joint Illustrative Masterplan (Appendix 2) has been developed between all parties.

4.3 EIA Screening / Scoping Opinion Applications have been received for the large majority of the site (5/2024/1602 and 5/2025/0362 comprising in total 620 residential units, 60 bed extra care facility, new neighbourhood centre (c.1 acre of commercial / community use) and 2FE Primary School (including early years provision) etc.) Both applicants have undertaken joint pre-application discussions where the two landowners, SADC and HCC have all been involved simultaneously in order to take forward coherent and coordinated approaches. Application 5/2024/1602 has gone through an extensive pre-application process and is the subject of a Planning Performance Agreement. Application 5/2025/0362 has also gone through an extensive pre-application process and is the subject of a Planning Performance Agreement. Applications are coming forward on the basis of being policy compliant with the Key Development Requirements set out in the new draft Local Plan.

4.4 NB: There are Main Modifications proposed for site B2 North East Harpenden as set out in SADC/ED85B and SADC/ED85C.

Q5 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?

5.1 Yes, it is considered that a safe and suitable to the site can be achieved.

- 5.2 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.
- 5.3 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.
- 5.4 The TIA for the site INF 09.03 - Transport Impact Assessment Appendix 1 2024 Harpenden (2024) includes:

3. Access Strategy

The site has direct access onto the B653 Lower Luton Road as well as Common Lane and Bower Heath Lane. An LTP compliant access strategy allowing safe and suitable access for all modes is deliverable/developable.

...

Conclusion

...

The site will be making significant contributions to the overall Harpenden Settlement Strategy. An LTP compliant access strategy allowing safe and suitable access for all modes is deliverable/developable. 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?

- 5.5 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. As set out in SADC/ED85B and SADC/ED85C this includes HCCs agreement to some small scale Main Modifications to the highways and public rights of way requirements.
- 5.6 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 further amended for clarity in Main Modifications in SADC/ED85B and SADC/ED85C and state:

Key development requirements

...

5. Delivery of / Contributions / ~~enhancements~~ to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.

6. ~~Support for improvements~~ Improvements via delivery or contributions to walking facilities along Common Lane to mitigate impacts on this road, especially at school pick-up / drop-off times. This potentially needs to include footway / cycleway from site to Common Lane, then improved crossings and side junction improvements.

7. ~~Support for improved~~ Improvements via delivery or contributions to access to Katherine Warington school is required including active travel connections to the school through the site.

8. ~~Support~~ Improvements via delivery or contributions to the Upper Lea Valley Way into Harpenden and out to Luton and for links to / from ~~and improvement of the Upper Lea Valley Way into Harpenden and out to Luton.~~

9. ~~Support for improvements~~ Improvements via delivery or contributions to the Public Rights of Way that link into the wider network to enable recreational use.

- 5.7 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.

Q6 How have the landscape impacts of the allocation been considered? Can the site be delivered in a way that avoids harmful landscape impact?

How have the landscape impacts of the allocation been considered?

- 6.1 The landscape impacts of the allocation have been considered in the evidence submitted to date. This includes:
- LPSS 02.04 - Green Belt Sites Recommended Broad Location Proformas (2024)
 - GB 02.02 - Green Belt Review Report (2023)
 - GB 02.03 - Green Belt Review Annex Proforma Report (2023)
 - EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024)
 - EDH 09.01 - Herts Landscape Character Area Statements St Albans District
- 6.2 Relevant impact considerations are set out in the EDH 05.01 - Landscape Visual Impact Appraisals Broad Locations SADC Local Plan Sites (2024), which also draws upon EDH 09.01 - Herts Landscape Character Area Statements St Albans District. Page 4 of EDH 05.01 sets out:

Stage 2 – Desk Study

14.A desk-based study was carried out to gather information about the landscape

and visual baseline of each broad location. This primarily drew on national/local landscape designations, and the landscape character area descriptions, evaluations, and strategy and guidelines, provided within the 'Hertfordshire Landscape Character Area Statements, St Albans District.'

6.3 EDH 05.01 page 37 sets out the following:

POTENTIAL DEVELOPMENT EFFECTS

Designated Landscapes

Landscape Conservation Area – Policy 104 – area of high landscape quality proposals will pay regard for setting, siting, design, and external appearance. Landscape improvements will normally be required...

6.4 EDH 05.01 provides a landscape and visual appraisal for site B2 and goes on to propose mitigation and enhancements:

STRATEGIC MEASURES

- *Respond to context and character.*
- *Retain and protect important landscape features and views.*
- *Create multifunctional green/blue infrastructure and open space networks for people and/or wildlife.*
- *Provide new structural native planting.*

SITE SPECIFIC MEASURES

- *The site wraps around the existing settlement edge and consumes Greenacres Equestrian Centre and appears to coalesce with the settlement at Sauncey Wood. To the north, the new development edge conditions will require careful consideration to conserve and enhance the distinct cluster of pastoral fields and hedgerows that provide the setting to the properties along Bower Heath Lane.*
- *The site can be split into three distinct landscape areas – northern, central, and southern (see below). The development proposals should seek to respond positively to the unique character and context of each area, whilst ensuring that they function as a whole, and as an extension of the existing settlement. Key opportunity to play on the experience and contrast of moving between areas of openness and enclosure,*
- ***Northern area: west facing undulating slopes of the Lee River valley*** – *this area is larger in scale, sloping, and more elevated and open. There are views between the site and the wider townscape and landscape to the west and south. Careful consideration should be given for mitigating the settlement edge whilst maintaining the sense of openness. Across the slopes consider orienting open space and streets to frame views out of the development towards the open/wooded horizons and layering bands of structural tree planting along the contours to help soften the roofscape in views towards the development.*

- **Central Area: The flatter elevated and more open plateau** – this area is the transition between the larger more open and elevated area to the north, and the smaller scale more enclosed area to the south. Longer distance views are shortened by the linear woodlands to the eastern side of Common Lane, providing a sense of enclosure. Across the slopes consider orienting open space and streets to frame views out of the development towards the open/wooded horizons and layering bands of structural tree planting along the contours to help soften the roofscape in views towards the development.
- **Southern Area: The enclosed small scale pastoral fields** – this area is a small-scale valley enclosed by slopes to the eastern side of Common Lane. The topography provides a sense of enclosure and intimacy and, due to the screening effect of the intervening topography and vegetation, feels remote from the existing settlement. The conservation and enhancement of the existing hedgerows and fields, and footpath Wheathampstead 061 (between Whittings Close and Sauncey Wood), will require careful consideration to maintain the rural character – consider avoiding development here or small-scale low-density layouts that can accommodate a significant structure of soft landscaping. Screen rear garden boundaries of Milford Hill.
- Conserve and enhance hedgerows and trees and rural character of Common Lane. Opportunity to create green pedestrian/cycle route parallel to Common Lane linking with footpath Wheathampstead 060
- Consider opportunity for links with wider network of green infrastructure routes and assets such as Porters Hill Park/playground and allotments.

6.5 Green Belt Sites Recommended Broad Location Proformas (2024) (LPSS 02.04) qualitative assessment sets notes the following:

... The site is adjacent to a County Wildlife Site, which is also a deciduous woodland Priority Habitat. Strips of undesignated woodland and mature trees can be found inside and along site boundaries.

The whole site is within a landscape conservation area.

Can the site be delivered in a way that avoids harmful landscape impact?

- 6.6 Yes, it is considered that the site be delivered in a way that avoids harmful landscape impact.
- 6.7 As set out in the response to the first part of this question, document EDH 05.01 proposes landscape mitigation and enhancement measures for site B2 that should be taken into consideration for planning applications and masterplanning.
- 6.8 Policy LG1 – Broad Locations in the Reg 19 Local Plan Part A (2024) (LPCD 02.01) provides the following requirements with regard to landscape at site B2:

m) Normally retain significant healthy trees and other important landscape features;

p) Positively relate and integrate the development to the surrounding buildings and landscape, and be informed by a comprehensive Landscape and Visual Impact Assessment which addresses the recommendations of the Council's Landscape and Visual Appraisal 2024;

r) Ensure that land use, density, landscaping and form have regard to the topography of the site and identified landscape impacts;

Q7 Is Policy B2 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 B2 is justified, effective and consistent with national planning policy.
- 7.2 As answered above in Policy B2 M7I2Q1 and Policy B2 M7I2Q3, Policy B2 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 B2 M7I2Q1 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 7.4 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site B2 for allocation, which states at paragraph 5.2.65:
- 5.2.65... strategic allocations were supported ... partially (NE Harpenden), comprising land not recommended by the GB Review. The decision to support these ... strategic sites was taken on balance following consideration of the wider social, environmental and economic factors, including in respect of infrastructure benefits, and in the context of a stretching LHN figure.*
- 7.5 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 in Policy B2 M7I2Q1.
- 7.6 Policy B2 as set out in Policy B2 M7I2Q1 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.

- 7.7 Policy B2 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 the Sustainability Appraisal.
- 7.8 Overall, Policy B2 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 7.9 N.B. Policy B2 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy B7 – North West Harpenden

Q1 What is the latest position regarding the development proposals for the site?

- 1.1 At the time of writing, the latest position is that an outline planning application for development proposals at site allocation B7 North West Harpenden was submitted to the Council in February 2023. The details of this application are set out below:

Reference Number: 5/2023/0327 **Location:** Land at Cooters End Lane and Ambrose Lane, Harpenden, Hertfordshire **Proposal:** Outline application (access sought) - Construction of up to 550 dwellings including circa. 130 Class C2 integrated retirement homes, affordable housing, early years setting, public open space, allotments and publicly accessible recreation space (including junior sport pitches) **Decision:** Pending

- 1.2 At the time of writing, application 5/2023/0327 is under consideration and has not yet been determined by the Council. However, the Council's Development Management Committee meeting on 17 February 2025 resolved that the application should be granted conditional planning permission, subject to the completion of a Section 106 agreement within six months (or an agreed extended period after six months) of the committee meeting. That six month period has been extended and considerable progress has been made with agreeing the S106, which is anticipated by both SAC and the landowner to be completed by December 2025. The officer recommendation in the 17 February Committee report was for approval.
- 1.3 It should be noted that the B7 site allocation boundary for 293 dwellings (indicative) is included within part of the application (5/2023/0327) site boundary for up to 550 dwellings. The application boundary covers a larger area than the site allocation boundary.

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.

- 2.4 In relation to the specific case in this location, North West Harpenden, AL5 3NP, 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 105 to 107, relating to sub-area 19, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purposes 2 and 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 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, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration as RA-15.

- 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 30 to 32 in LPSS 02.04 Green Belt Sites Recommended Broad Location 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 B7 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 B7 is justified, effective and consistent with national planning policy.
- 3.2 As answered above in Policy B7 M7I2Q2, Policy B7 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).
- 3.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy B7 M7I2Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 3.4 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 in the proforma assessment

(Site ref M-006) on pages 30 to 32 in LPSS 02.04 Green Belt Sites Recommended Broad Location Proformas (2024) and as set out in Policy B7 M712Q2.

- 3.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site B7 for allocation, which states at paragraph 5.4.57 to 5.4.58:

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

5.4.58 A starting point is NW Harpenden strategic urban extension, which is both recommended by the Green Belt Review and proposed for a strategic scale scheme (293 homes) with the potential for infrastructure benefits. There is an assumption that community facilities to the benefit of the existing and future residents would be provided, including facilities that may enhance the offer of the existing nearby local centre, as well as extensive greenspace and improved cycling connections to the town centre

- 3.6 Policy B7 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/ED4 - Statement of Common Ground between SADC and Central Bedfordshire 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

- 3.7 Policy B7 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 the Sustainability Appraisal.

- 3.8 Overall, Policy B7 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.

- 3.9 N.B. Policy B7 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

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) 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.
- 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 16, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength
Both the inner and outer boundary are 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 strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration as RA-13.

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

North-western boundary – Townsend Lane

South-western boundary – 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.

- 2.4 In relation to the specific case in this location, Townsend Lane, Harpenden, AL5 2RH, 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 93 to 95, relating to sub-area 16, states:

Purpose Assessment

Summary

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

Wider Green Belt Impacts

Summary

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

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration as RA-13.

- 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 17 to 18 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 What effect will development have on the Chilterns Beechwoods Special Area of Conservation SAC and how will any adverse impacts on the integrity of the site be avoided and/or mitigated?

3.1 The effects of development at Townsend Lane, Harpenden, AL5 2RH (M7) on the Chilterns Beechwoods Special Area of Conservation (CBSAC) have been considered in the Habitats Regulations Assessment 2024 (LPCD.04.01) (HRA). The HRA sets out in 'Table 3: LP Site Allocation Test of Likely Significant Effects' 'HRA Implications' that the allocation has the 'Potential for Likely Significant Effect'. It also sets out that any adverse impacts on the integrity of the site can be avoided and/or mitigated by adherence to the Council's Mitigation Strategy.

3.2 As set out in the Local Plan Part A Policy SP1 and SP10 the Local Plan supports:

Protection and enhancement of the Chilterns Beechwoods Special Area of Conservation (CBSAC);

Make appropriate contributions towards the Strategic Access Management and Monitoring Strategy (SAMMS), where the proposal is for additional housing within the Chilterns Beechwoods Special Area of Conservation (CBSAC) Zone of Influence (ZOI). Such development proposals will also need to make provision for a new Suitable Alternative Natural Greenspace (SANG), or alternatively contribute towards the maintenance of a suitable SANG project elsewhere;

3.3 There is an emerging planning application for the site, which is progressing through the Pre-Planning Application process and for which there is a PPA. Natural England have confirmed that as the current draft proposal has its access outside of the ZOI then it would not need to make SAMMS contributions or to provide or contribute to a SANG. The position will be kept under review as the draft proposal evolves.

3.4 Notwithstanding this, the potential effect of development at Townsend Lane, Harpenden, AL5 2RH (M7) HRA Table 3: LP Site Allocation Test of Likely Significant Effects sets out in relation to Allocation M7:

Notes

Housing 65 units (indicative)

HRA Implications

Potential for Likely Significant Effect.

Located within the 12.6km core recreational Zone of Influence of Chilterns Beechwoods SAC.

3.5 The HRA identifies in Section 5.3 'In Combination Assessment' that the allocation could potentially result in a Likely Significant Effect upon the SAC in combination.

3.6 The HRA also sets out in Section 6.1 'Recreational Pressure' paragraph 6.1.1 that this allocation is part of the suite of policies and allocations that "...all provide for new residential development within the 12.6km core recreational ZOI and as such could

provide a linking impact pathway to Chilterns Beechwoods SAC via increased recreational pressure (in combination) as a result of increased population living in the new dwellings provided by the LP."

- 3.7 The HRA then goes on to consider the mitigation measures in the Draft Plan, as follows:

6.1.2 No further analysis is necessary or possible given the strategic work already undertaken. Rather the focus of appropriate assessment needs to be on mitigation in the form of the available SANG capacity and its provision.

6.1.3 Paragraph 10.8 of the LP acknowledges this issue. It states:

6.1.4 "10.8... A buffer Zone of Influence of 12.6km around this covers part of St Albans District, and the Council is legally required not to issue decisions within this buffer until appropriate mitigation is secured through a Mitigation Strategy. A key element in the Mitigation Strategy will be the identification and/ or creation of Suitable Alternative Natural Greenspace (SANG) to draw people away from using the SAC.

...

6.1.6 In addition, suitable policy wording of the Local Plan is included within Strategic Policy SP10 to ensure that any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

- 3.8 The HRA then goes on to consider the St Albans Strategic Mitigation Strategy, including the following:

6.1.11 St Albans DC has been working with Natural England and partner authorities (Buckinghamshire Council, Central Bedfordshire Council and Dacorum Borough Council) in preparing the Chilterns Beechwoods SAC Mitigation Strategy. As the landowner, the National Trust has also been involved. The agreed Mitigation Strategy comprises of two parts, the Strategic Access Management and Monitoring Strategy (SAMMS), and Suitable Alternative Natural Greenspace (SANG) provision. The SAMMS addresses issues within the SAC itself. The interventions required have been identified and agreed. A range of projects will be implemented over a period of at least 80 years, (2022/23 to 2102/2103) by the National Trust. To fund the SAMMS, each new home built located within the ZOI within St Albans are required to pay a tariff of £828.6146 (subject to change). The SANG provision will provide alternative natural greenspace for recreation to divert recreational activities away from the SAC. All new residential development within the ZOI must contribute towards either a) a new (bespoke) SANG or b) contribute towards suitable SANG projects elsewhere; this is in addition to contributions towards the SAMMS. Larger developments (10 or more new homes) must provide their own suitable SANG that meets the guidance from Natural England. Smaller developments (1-9 homes) can contribute towards an existing SANG.

6.1.12 As previously detailed the SAMMS element of the Mitigation Strategy has been agreed by Natural England, which leaves only the SANG provision for the

development planned by the St Albans Local Plan that requires further analysis. This is provided in the following paragraphs.

- 3.9 The HRA then goes on to consider SANG Provision to Support the Local Plan, including in relation to Townsend Lane, Harpenden, AL5 2RH (M7) as follows:

6.1.22... It is not known if the applicants for M7, M16 and P3 are currently looking for a SANG solution for their sites. However, as detailed in the Hemel Garden Communities discussion above, it is understood that there is likely to be excess capacity within the Hemel Garden Communities SANG, and this is anticipated to be the primary SANG to support the St Albans District Local Plan. Further, as identified above, it is noted that the housing trajectory document identifies that all these allocations are not due to be delivered until year 6 of the Plan or later. The Local Plan will be subject to review in year 5.

- 3.10 The HRA concludes:

7.1.5 The Local Plan contains suitable policy wording to ensure that any allocations and any windfall development that falls within the 12.6km core recreational ZOI does not result in a likely significant effect and also adheres to the forthcoming Mitigation Strategy.

7.1.6 Following an analysis of the current position relating to the availability, deliverability and timing of SANG provision in relation to the expected delivery time frames for residential development, it was concluded that, whilst not all allocations have a SANG strategy identified, those without a SANG solution in place are not to be occupied until at least year 6 of the Local Plan. The Council has confirmed that they are confident that appropriate SANG solutions will be delivered for all of the relevant sites within the Local Plan. This confidence is in part demonstrated by the Council's commitment to the Chilterns Beechwoods SAC Mitigation Strategy as agreed in the Council's Policy Committee March 2023. It is considered that with the Chilterns Beechwood SAC Mitigation Strategy in place, and the Council's confidence to deliver SANG in a timely fashion, (acknowledging the excess SANG capacity at Hemel Garden Communities), that no adverse effects on the integrity of the Chilterns Beechwoods SAC would result.

- 3.11 It is considered that the potential effects of the development at M7 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they will be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan.
- 3.12 This position is supported by Natural England, as set out in the Statement of Common Ground between SADC and Natural England (SADC/ED24), where it states:

Mitigating the impact of development on Chiltern Beechwoods SAC

- 12.6km Zone of Influence announced by Natural England where mitigation for new residential development will be required with SANGs and SAMMs.*

- *Strategic matter between:*
 - o SADC
 - o Dacorum Borough Council
 - o Central Bedfordshire Council
 - o Buckinghamshire Council
 - o Natural England

Conclusion

SADC and NE both support the approach in SADC's Regulation 19 draft Local Plan to mitigating the impact of development on the Chiltern Beechwoods SAC.

- 3.13 In the circumstances, it is considered that the potential effects of the development at M7 on the CBSAC have been suitably considered in the HRA and in the Plan, and that they can be appropriately mitigated as a result, through provision of SANG onsite and contributions towards SAMMS, as set out in the Plan. It is also noted that the Council's approach in this regard is supported by Natural England.

Q4 Is Policy M7 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 M7 is justified, effective and consistent with national planning policy.
- 4.2 As answered above in Policy M7 M7I2Q2, Policy M7 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).
- 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 M7 M7I2Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 4.4 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 a proforma assessment (Site ref C-057) on pages 17 to 18 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) and as set out in Policy M7 M7I2Q2.
- 4.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site M7 for allocation, which states at paragraph 5.4.61:

5.4.61 • Townsend Lane (65 homes) – is at the western extent of Harpenden, ~1km from the town centre and near adjacent to a secondary school, plus the Nickey Line cycle route is adjacent (particularly good for accessing Redbourn and Hemel, whilst trips to Harpenden would likely be via road). The site is in the control of a housebuilder, such that it can likely deliver early, and the consultation response

received in 2023 (ref 800) covers a range of issues. However, the site intersects the Chilterns Beechwoods SAC zone of influence, and the response is not clear on SAMM/SANG contributions.

- 4.6 Policy M7 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 M7 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 the Sustainability Appraisal.
- 4.8 Overall, Policy M7 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 4.9 N.B. Policy M7 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M16 – Falconers Field

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.

- 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 96, 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 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 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, 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 as RA-14.

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

Northwestern boundary – Bounded by existing well-established hedgerows and trees on the ground

Western boundary – Bounded by existing well-established hedgerows and trees on the ground

Southern boundary – Bounded by existing well-established hedgerows and trees on the ground

- 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 the 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 Matter 3, Issue 3, Question 1 and as addressed in the Green Belt and Exceptional Circumstances – Evidence Paper (GB 01.01). GB 01.01 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.

- 2.4 In relation to the specific case in this location, Falconers Field, Harpenden, AL5 3ES, the specific localised Green Belt impacts are well understood because of the findings of the Green Belt Review (GB 02.02 and GB 02.03). The Green Belt Review Annex Proforma Report (GB 02.03) on page 99, relating to sub-area 17, states:

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important

contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-14.

- 2.5 The site was considered in the round in the site selection work which is set out on pages 9 to 10 in the Green Belt Sites Recommended Medium & Small Site Proformas (LPSS 02.06). 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 Is Policy M16 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 M16 is justified, effective and consistent with national planning policy.
- 3.2 As answered above in Policy M16 M7I2Q2, Policy M16 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).
- 3.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M16 M7I2Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 3.4 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 in Policy M16 M7I2Q2.
- 3.5 Policy M16 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 M16 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).
- 3.7 Overall, Policy M16 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 3.8 N.B. Policy M16 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M17 – Land North of Wheathampstead Road

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

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

- 1.1 The site boundary of Policy M17 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 M17 M7I2Q2 below.
- 1.2 The site boundary of Policy M17 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 Policy M17 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.*

- 1.5 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 174 to 176, relating to sub-area 36, states:

Purpose Assessment

Summary

The sub-area meets the purposes strongly overall. The sub-area meets purpose 1 and performs strongly against purposes 1 criteria (b). The sub-area does not meet purposes 2 and 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 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 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 as RA-22 (including the thin strip of Green Belt land along Piggotshill Road to the west of the sub-area).

- 1.6 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 44 to 45 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.

1.7 The site boundary of Policy M17 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

1.8 Overall, the site boundary for Policy M17 is considered to be justified and effective.

What is the existing use of the site?

1.9 This is set out in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) on page 44, the current land use is “*Agricultural / Grazing land*”. It also contains one dwelling.

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.
- 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 36, 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 partially readily recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries 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 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 as RA-22 (including the thin strip of Green Belt land along Piggotshill Road to the west of the sub-area).

- 2.5 There are effectively two new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – Unclassified private road and well-established trees leading to Aldwickbury School

Eastern boundary – Unclassified private road and well-established trees leading to Aldwickbury School

- 2.6 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.

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

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

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 M17 M7I2Q1.

- 3.2 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.

- 3.3 In relation to the specific case in this location, North of Wheathampstead Road, Harpenden, AL5 1AB, 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 M17 M7I2Q1.
- 3.4 As set out in Policy M17 M7I2Q1 above, the Site Selection process set out in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) assessed site M17 for potential allocation in the Plan and recommended the site to progress.
- 3.5 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 Is Policy M17 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 M17 is justified, effective and consistent with national planning policy.
- 4.2 As answered above in Policy M17 M7I2Q1 and M7I2Q3, Policy M17 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).
- 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 M17 M7I2Q1 the Green

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

- 4.4 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 a proforma assessment as set out in Policy M17 M7I2Q1.
- 4.5 Policy M17 as set out in Policy M17 M7I2Q1 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.
- 4.6 Policy M17 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).
- 4.7 Overall, Policy M17 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 4.8 N.B. Policy M17 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M19 – Piggotshill Lane and UC47 – Crabtree Fields

Q1 What is the existing use of the combined site and what is the reason for having separate allocations?

What is the existing use of the combined site

- 1.1 The two sites are in different uses. Site M19 is a small grass field. The landowners describe it in their response to the draft Local Plan Regulation 19 publication (0195) as "...set to grass".
- 1.2 Site UC47 is an area of mixed uses. These comprise: community uses including Harpenden & District Indoor Bowling Club, Scouts and Air Training Corps; car parking; storage; scrub; circulation and incidental space. These uses adjoin the public open space at Crabtree Fields Open Space.
- 1.3 The important context of UC47 and M19 is that they are currently within the Green Belt, but within a wider area recommended to be removed from the Green Belt in GB 02.03 - Green Belt Review Annex Proforma Report (2023) and proposed to be removed from the green Belt in the draft Plan.

what is the reason for having separate allocations?

- 1.4 Site M19 is owned by private landowners who have undertaken significant amounts of technical work regarding the site and are actively bringing forward proposals to the Council in order to deliver an acceptable proposal that uses part of UC 47 as an access. This has included active engagement in summer 2025.
- 1.5 Site UC47 is owned by the Council, which is actively seeking to accommodate the proposal for an access to be gained for M19 across the Council's land. The Council is also actively seeking to bring forward a proposal for residential development in line with the Key Development Requirements for UC47, including the need to provide "an overarching approach to design and access". However, delivery on the Council-owned UC 47 might take slightly longer to be delivered, given the need to appropriately accommodate the existing community uses on the site. The Council does not wish to delay the proposals for M19 and so two separate allocations is considered to be a reasonable approach. Both sites are set out as being "developable" sites and are anticipated to come forward in years 6-10 of the Plan (post-adoption), taking a relatively cautious approach (as set out in Matter 2 Issue 1 Question 1 Appendix 1 – Updated Housing Trajectory Addendum).
- 1.6 NB: There is a proposed Modification to change the numbering from UC47 to M47 as set out in SADC/ED85B and SADC/ED85C.

Q2 Is it clear how the entire site will come forward for development? Is it deliverable?

Is it clear how the entire site will come forward for development?

- 2.1 Yes, it is considered to be clear how the entire site will come forward, as set out in answer to M7I2Q1 above.

Is it deliverable?

- 2.2 Yes, (as above) both sites are set out as being "developable" sites and are anticipated to come forward in years 6-10 of the Plan (post-adoption), taking a relatively cautious approach (as set out in Matter 2 Issue 1 Question 1 Appendix 1 – Updated Housing Trajectory Addendum).

Q3 What is the extent of the area to be removed from the Green Belt? How does this relate to the land allocated for development?

What is the extent of the area to be removed from the Green Belt?

- 3.1 Site allocations M19 and UC47 are both contained within the same sub-area (SA-33) as identified by the Stage 2 Green Belt Review (GB 02.02). This sub-area was recommended for further consideration by the Stage 2 Green Belt Review on the grounds that it made a weak contribution to the NPPF purposes of Green Belt, and it only made a less important contribution to the wider Green Belt.
- 3.2 In the Regulation 18 consultation on the draft Local Plan three sites in the SA-33 sub-area were proposed as allocations. These were M19, UC47 and a site known as M5, the Sewage Treatment Works, Piggottshill Lane, Harpenden, which had been put forward by Thames Water. Whilst they did not extend to the whole of the sub-area SA-33, most parts of the SA-33 sub-area were proposed as allocations so the whole sub-area was proposed for removal from the Green Belt.
- 3.3 Subsequent to the Regulation 18 consultation, Thames Water informed SADC that the Sewage Treatment Works site, M5, was no longer available for development so it was removed from the draft Local Plan. However, the proposed removal of the wider SA-33 sub-area from the Green Belt was not amended as is shown in SADC's response to Matter 11 Issue 1 Question 1.
- 3.4 Hence, the extent of the area to be removed from the Green Belt extends to the whole SA-33 sub-area as originally identified in the Stage 2 Green Belt Review. It can also be noted that Piggottshill Lane forms a logical long term Green Belt boundary.

How does this relate to the land allocated for development?

- 3.5 As set out above, sites M19 and UC47 form part of the larger SA-33 sub-area as identified by the Stage 2 Green Belt Review (GB 02.02). It was the wider sub-area that formed the basis for the amendments to the Green Belt boundary, rather than the site allocations.

Q4 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 4.1 Yes, it is considered that the exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 4.2 The strategic case to amend Green Belt boundaries is set out in answer to Matter 3, Issue 3, Question 1 and as addressed in the Green Belt and Exceptional Circumstances – Evidence Paper (GB 01.01). GB 01.01 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.*

4.3 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.

4.4 In relation to the specific case in this location, M19 - Piggottshill Lane, Harpenden, AL5 5UN and UC47 - Crabtree Fields and Land at Waldegrave Park, Harpenden, AL5 5SA the specific localised Green Belt impacts are well understood because of the findings of the Green Belt Review (GB 02.02 and GB 02.03). The Green Belt Review Annex Proforma Report (GB 02.03) on page 162 to 164, relating to sub-area 33, states:

Purpose Assessment

Summary

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

Wider Green Belt Impacts

Summary

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

Sub-area category & recommendation

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

4.5 For Policy M19, 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 11 to

13 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.

- 4.6 NB: For Policy UC47, as part of preparing this answer, it has become apparent that there is a minor error whereby the site has been treated as an urban site proforma under LPSS 02.15 - Urban Sites Recommended UCS Proformas (2024). Main Modifications are set out in SADC/ED85B and SADC/ED85C to reflect that the site should have been characterised as a Medium Green Belt site, however this minor error does not change the overall assessment or the overall approach to the site set out by the Council.
- 4.7 Overall, the site selection work concluded that the sites were recommended to progress, and the exceptional circumstances are considered to exist to justify amending the Green Belt boundary in these locations.

Q5 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?

- 5.1 Yes, it is considered that a safe and suitable to the sites can be achieved.
- 5.2 A Transport Impact Assessment (TIA) was completed for the sites which informed the Local Plan by considering the impacts of developing the sites 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.
- 5.3 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.
- 5.4 The TIA for site M19 in INF 09.03 - Transport Impact Assessment Appendix 1 2024 Harpenden (2024) includes:

3. Access Strategy

The site has direct access onto Piggottshill Lane. Piggottshill Lane is narrow and there is currently no pedestrian provision. Access for pedestrians and cycles through the other nearby sites instead of Piggotshill Lane will be essential. Suitable access and design, including for pedestrians and cyclists, will need to be agreed with the County Council. There is a reasonable prospect that a Local Transport Plan (LTP) compliant access strategy allowing safe and suitable access for all modes is deliverable.

...

Conclusion

...

There is a reasonable prospect that an LTP compliant access strategy allowing safe and suitable access for all modes is deliverable. The Comet Model Forecast shows that traffic impacts generated by cumulative traffic in the area, including the site, 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'.

- 5.5 The TIA for site UC47 in INF 09.03 includes:

3. Access Strategy

The site has direct access onto Waldegrave Park. An overarching approach to design and access will be needed to M19. There is a reasonable prospect that an LTP compliant access strategy allowing safe and suitable access for all modes is deliverable.

...

Conclusion

...

There is a reasonable prospect that an LTP compliant access strategy allowing safe and suitable access for all modes is deliverable. The Comet Model Forecast shows that traffic impacts generated by cumulative traffic in the area, including the site, 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?

- 5.6 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. As set out in SADC/ED85B and SADC/ED85C this includes HCCs agreement to some small scale Main Modifications to the highways and public rights of way requirements.
- 5.7 The necessary highway improvements are made clear to users of the Plan in the key development requirements of the site allocations which are set out in LPCD 02.02 –

Reg 19 Local Plan Part B (2024) and further amended for clarity in Main Modifications in SADC/ED85B and SADC/ED85C and state:

M19 - Piggottshill Lane, Harpenden, AL5 5UN

...

Key development requirements

...

1. Piggottshill Lane is narrow and cannot serve as the vehicle access route due to the scale of development and nature of the lane and there is currently no pedestrian provision. Suitable access and design across land to the west of the site, including for pedestrians and cyclists, will need to be agreed with the County Council.
2. Access including for pedestrians and cycles to the allocated site to the west (Site UC47) must be facilitated.
3. Delivery of / Contributions / ~~enhancements~~ to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.
4. Contributions to wider active travel routes including to the Town Centre and train station should be considered and could include crossing and junction improvements along Crabtree Lane as well as footway improvements along Aldwickbury Crescent / Dalkeith Rd (all as per LCWIP).

UC47 M47 - Crabtree Fields / Land at Waldegrave Park, Harpenden, AL5 5SA

...

2. The site adjoins M19 which is also proposed for development, and an overarching approach to design and access will be needed.
3. Delivery of / Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA. Including footway improvements, junction improvements and crossings on Aldwickbury Crescent and Crabtree Lane.
- 3A. In accordance with adopted Waste Local Plan Policy 5: Safeguarding of Sites, the nearby safeguarded Sewage Treatment Works must be considered in the design to ensure no unreasonable restrictions are placed upon the facility and the proposal does not prejudice its current or future operation. The Waste Planning Authority must be involved in scheme Design and will be directly consulted on any planning application at the site.

- 5.8 Overall, the key development requirements alongside policies including SP14 – Delivery of Infrastructure are considered sufficiently clear about where and how they would be delivered.

Q6 Is Policy M19 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 6.1 Yes, it is considered that Policy M19 is justified, effective and consistent with national planning policy.
- 6.2 As answered above in Policy M19 and UC47 M7I2Q4, Policy M19 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).

- 6.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M19 and UC47 M7I2Q4 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 6.4 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 in Policy M19 and UC47 M7I2Q4.
- 6.5 Policy M19 is effective as the Council has engaged with the landowner(s) of the site (including active engagement in summer 2025) 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
- 6.6 Policy M19 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).
- 6.7 Overall, Policy M19 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 6.8 N.B. Policy M19 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M20 – Lower Luton Road, Harpenden

Q1 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

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

- 1.2 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.*

- 1.3 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.

- 1.4 In relation to the specific case in this location, Lower Luton Road, Harpenden, AL5 5AF, 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 158 to 160, relating to sub-area 32, states:

Purpose Assessment

Summary

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

Wider Green Belt Impacts

Summary

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

Sub-area category & recommendation

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

- 1.5 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 22 to 24 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024). This is set out in particular in the Qualitative Assessment:

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

...

This site is recommended to progress

- 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.

Q2 Is the allocation justified, effective and consistent with national planning policy, having particular regard to flooding and flood risk?

flooding and flood risk

- 2.1 Yes, it is considered that Policy M20 is justified, effective and consistent with national planning policy having particular regard to flooding and flood risk.
- 2.2 M20 is considered to be consistent with national planning policy in terms of flood risk as there is no part of the development proposed in areas at risk from flooding. Site M20 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 M20 are set out on page 18 in the Flood Risk Sequential and Exception Test 2024 (SET) (SADC/ED64) in Appendix 1 - Sequential Test for Sites Considered for Regulation 19 Allocation:

Part of the site is within Flood Zone 2, 3a and 3b and the development type is 'More Vulnerable'. The Exception Test is required

- 2.3 The SET shows 3% of the site is within Flood Zone 2.
- 2.4 The Flood Risk Sequential and Exception Test 2024 (SET) (SADC/ED64) in Appendix 2 - Exception Test sets out on pages 54-55 for site M20:

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 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. As such, there is no need to consider alternative sites in Flood Zone 1.

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

1. There must be no residential development outside Flood Zone 1 and the Exception Test is required because part of the site is within Flood Zone 2, 3a, 3b and the development type is 'More Vulnerable'. The site is also at risk of other sources of flooding including surface water and ground water.

- 2.6 There is no surface water flood risk on site M20 as set out on page 18 of SADC/ED64.
- 2.7 As set out in The Flood Risk Addendum – July 2025 (Examination Document SADC/ED77) on page 7, Groundwater flood risk at a depth of less than 0.025m was identified across 58% of this site by the SFRA Level 1 Addendum (2024). To reflect the area of the site at groundwater flood risk this would reduce the capacity of homes to 12, a fall of 13.

Is the allocation justified, effective and consistent with national planning policy

- 2.8 As answered above in Policy M20 M7I2Q1, Policy M20 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).
- 2.9 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M20 M7I2Q1 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 2.10 As set out in Policy M20 M7I2Q1 above, the Site Selection process set out in in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) assessed site M20 for potential allocation in the Plan and recommended the site to progress.
- 2.11 Policy M20 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

- 2.12 Policy M20 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)
- 2.13 Overall, Policy M20 is considered to be justified, effective and consistent with national planning policy.
- 2.14 N.B. Policy M20 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M21 – Land at Rothamsted Lodge, Hatching Green

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.
- 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 15b, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

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

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

Northern boundary – Unclassified private road and well-established hedgerow and treeline

Western boundary – Unclassified private road and well-established hedgerow and treeline

Southern boundary – Unclassified private road and well-established hedgerow and treeline

- 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 the 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 Matter 3, Issue 3, Question 1 and as addressed in the Green Belt and Exceptional Circumstances – Evidence Paper (GB 01.01). GB 01.01 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.

- 2.4 In relation to the specific case in this location, Rothamsted Lodge, Hatching Green, AL5 2JS, the specific localised Green Belt impacts are well understood because of the findings of the Green Belt Review (GB 02.02 and GB 02.03). The Green Belt Review Annex Proforma Report (GB 02.03) on pages 88-90, relating to sub-area 15b, states:

Purpose Assessment

Summary

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

Wider Green Belt Impacts

Summary

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

Categorisation & Recommendation

Sub-area category & recommendation

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

- 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 19 to 21 in the Green Belt Sites Recommended Medium & Small Site Proformas (LPSS 02.06). 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 Is Policy M21 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 M21 is justified, effective and consistent with national planning policy.
- 3.2 As answered above in Policy M21 M7I2Q2, Policy M21 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).

- 3.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M21 M7I2Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 3.4 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 in Policy M21 M7I2Q2.
- 3.5 Policy M21 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 M21 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)
- 3.7 Overall, Policy M21 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 3.8 N.B. Policy M21 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M22 – Wood End, Hatching Green

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

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

- 1.1 The site boundary of Policy M22 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.

- 1.2 The site boundary of Policy M22 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 Policy M22 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.*

- 1.5 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 80 to 82, relating to sub-area 14, states:

Purpose Assessment

Summary

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

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 is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-9 or in combination as a partial release of RA-9 with the partial release of SA-15b, as RC-2.

- 1.6 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.
- 1.7 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 14, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

Both the inner and outer boundaries are recognisable and likely to be permanent. If the subarea was released, the new inner Green Belt boundaries would meet the NPPF definition.

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, the new inner Green Belt boundary would meet the NPPF definition for readily recognisable and likely to be permanent boundaries. Recommended for further consideration in isolation as RA-9 or in combination as a partial release of RA-9 with the partial release of SA-15b, as RC-2.

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

Western boundary – well-established woodland edge

- 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 7 to 10 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.

- 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 M22 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
- 1.12 Overall, the site boundary for Policy M22 is considered to be justified and effective.

What is the existing use of the site?

- 1.13 The site consists of one large house in large grounds and an associated paddock.
- 1.14 As set out in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) on page 7, the current land use is “residential”.
- 1.15 The Reg 19 representations made by the landowner (ref 89-1) on page 3 describes the site as follows:

...The site currently consists of residential and paddock land...

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

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

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 M22 M7I2Q1.

- 2.2 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.

- 2.3 In relation to the specific case in this location, Wood End, Hatching Green, Harpenden, AL5 2JT, 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 M22 M7I2Q1.
- 2.4 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 as set out in Policy M22 M7I2Q1.
- 2.5 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 M22 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 M22 is justified, effective and consistent with national planning policy.
- 3.2 As answered above in Policy M22 M7I2Q1, Policy M22 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).
- 3.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M2 M7I2Q1 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 3.4 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 in Policy M22 M7I2Q1.
- 3.5 Policy M22 as set out in Policy M22 M7I2Q1 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.
- 3.6 Policy M22 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).

- 3.7 Overall, Policy M22 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 3.8 N.B. Policy M22 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M25 – Baulk Close, Harpenden

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

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

- 1.1 The site boundary of Policy M25 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.
- 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 Policy M25 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.*

1.5 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 118 to 120, relating to sub-area 22, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purposes 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purposes 2 and 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 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, 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 as RA-16.

1.6 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.

1.7 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 22, 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 partially recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries 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, 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 as RA-16.

- 1.8 There are effectively two new proposed Green Belt boundaries in the Plan, which are:

Northern boundary – the River Lea and well-established woodland edges (abutted by the lea valley line footpath and cycleway (former railway line))

Eastern boundary – Well-established woodland edges

- 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 14 to 16 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.

- 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 M25 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
- 1.12 Overall, the site boundary for Policy M25 is considered to be justified and effective.

What is the existing use of the site?

- 1.13 As set out on page 14 of the LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024), the site is “scrub land”.

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) and as shown in Policy M25 M7I2Q1.
- 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.

- 2.4 In relation to the specific case in this location, Baulk Close, Harpenden, AL5 4LY, 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 M25 M7I2Q1.
- 2.5 As set out in Policy M25 M7I2Q1 above, the Site Selection process set out in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) assessed site M25 for potential allocation in the Plan and recommended the site 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 have the risks from flooding been considered as part of the site's allocation, having particular regard to surface water and ground water flooding?

- 3.1 Site M25 Baulk Close 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 M25 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:

In the northeastern area of the site a proportion of the site is located within Flood Zone 2 and 3. The Exception Test is required.

- 3.2 The SET shows 20% of the site is within Flood Zone 2 and 2% within Flood Zone 3a.
- 3.3 The Flood Risk Sequential and Exception Test 2024 (SET) (SADC/ED64) in Appendix 2 - Exception Test sets out for site M25:

The site is predominantly in Flood Zone 1. Development can be restricted to Flood Zone 1, following a sequential approach to layout.

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.

As such, there is no need to consider alternative sites in Flood Zone 1.

- 3.4 No surface water flood risk at 1% AEP was identified at site M25.
- 3.5 Groundwater flood risk at a depth of less than 0.025m was identified over just 1% of this site by the SFRA Level 1 Addendum (2024).

Q4 Is Policy M25 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 M25 is justified, effective and consistent with national planning policy.
- 4.2 As answered above in Policy M25 M7I2Q2, Policy M25 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).
- 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 M25 M7I2Q2 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 4.4 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 in Policy M25 M7I2Q1.
- 4.5 Policy M25 as set out in Policy M25 M7I2Q1 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.

- 4.6 Policy M25 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).
- 4.7 Overall, Policy M25 is considered to be justified, effective and consistent with national planning policy. We are of the view that it is an entirely appropriate allocation (in the context of the chosen spatial strategy) and is deliverable.
- 4.8 N.B. Policy M25 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.