

Matter 7 – Residential Site Allocations

Issue 6 – Bricket Wood Site Allocations

Policy M4/OS1 – North of Oakwood Road

Q1 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that Plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

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

- 1.1 The primary justification is the need to deliver the housing requirements set out in the Plan, which is seeking to meet the 'Standard Method' for housing in full. There is also the need to deliver a range of other associated infrastructure and community facilities.

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

- 1.2 Yes, 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 161, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

If the sub-area was released, the new inner Green Belt boundary 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-50 along with the area of urban character to the south-east of the sub-area.

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

Northern boundary – M25 motorway

Eastern boundary – well-established tree belt and the regular backs of residential properties and gardens along Meadow Close, Garnett Drive, Woodside Road

Western boundary – A405 road

- 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, North of Oakwood Road, Bricket Wood, AL2 3PT and Land to the North of Bricket Wood, bounded by the M25 and A405 North Orbital, AL2 3ET, 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 the sub-area proforma assessments for this location. GB 02.03 on pages 710 to 713, relating to sub-area 161, states:

Purpose Assessment

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or purpose 4, performs moderately 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 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-50 along with the area of urban character to the south-east of the sub-area.

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 across two proforma assessments (Site Ref O-028 and O-029) on pages 34 to 36 in LPSS 02.06 Green Belt Sites Recommended Medium & Small Site Proformas (2024) and on pages 2 to 4 in LPSS 02.08 Green Belt Sites Recommended Other Site Proformas (2024). This is set out in particular in the Qualitative Assessment in both proformas which say:

Policy M4:

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

The site is adjacent to Bricket Wood, a Tier 5 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt. It is within the 250 metres Green Belt Study settlement buffer.

The site is approximately; 170 metres from a bus stop, 5.9 kilometres from St Albans City railway station and 1.8 kilometres from Bricket Wood branch line station.

The site is adjacent to a deciduous woodland Priority Habitat, parts of which are designated as a woodland TPO and a group TPO. The site contains mature trees, scrub and a strip of undesignated woodland along the site boundaries.

The site is within the 100 metres buffer of an archaeological area subject to recording conditions.

The site contains an area of contaminated land.

Potential access includes via Oakwood Road.

This site is recommended to progress.

Policy OS1:

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

The site is adjacent to Bricket Wood, a Tier 5 Settlement in the Settlement Hierarchy. The whole site is within the Green Belt. It is within the 250 metres Green Belt Study settlement buffer.

The site is approximately; 1.5 kilometres from a primary school, 3.9 kilometres from a secondary school, 1 kilometre from a bus stop, 6 kilometres to Radlett mainline railway station, 1.4 kilometres from Bricket Wood branch line railway station and 650 metres to a Local Centre.

The site is adjacent to deciduous woodland Priority habitats along the south western and north western boundaries. Parts of the deciduous woodland priority habitats located to the south west of the site are also designated as woodland and group TPOs.

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

A national grid electricity tower is in south of site and national grid overhead line runs through the east of the site.

Potential access is via an extension to Woodside Road to the south of the site. A public right of way footpath runs along part of the west boundary.

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 is the justification for separate allocations, rather than a single site covering M4 and OS1? Is it sufficiently clear what is required by Policy M4(1) which refers to co-ordination between the two sites?

What is the justification for separate allocations, rather than a single site covering M4 and OS1?

3.1 The sites are considered to be justified as being separate allocations rather than a single site. Site M4 is being allocated as a residential site only. Site OS1 is being allocated for community facilities. They are both in the same longstanding ownership. The key development requirements set out in Reg 19 Local Plan Part B (2024) (LPCD 02.02) for OS1 set out:

1. *The site is allocated for community uses only – in line with the aims of the St Stephen Neighbourhood Plan. These community uses may comprise:*
 - *allotments and a landscaped parkland area, with public access via bridleways and footpaths, and with additional tree planting along the boundary with the M25*
 - *a new medical centre and / or a relocation of the Scout group*
 - *a community centre and associated outdoor sport and recreation facilities.*

3.2 The very different proposed uses on the two sites mean that, it is considered to be more effective to allocate them separately, due to potential variations in key factors such as timeframe and planning contributions. There are active proposals to bring forward the housing site M4, however, delivery of the community facilities at OS1 might take somewhat longer to be delivered. The Council does not wish to delay the proposals for M4 and so two separate allocations is considered to be a reasonable approach

Is it sufficiently clear what is required by Policy M4(1) which refers to co-ordination between the two sites?

3.3 Yes, it is considered to be sufficiently clear what is required by Policy M4(1) which refers to co-ordination between the two sites.

3.4 Site M4 sets out the following key development requirement:

1. *Co-ordination with the site allocated for new community facilities (OS1) and community green space to the east is required.*

3.5 OS1 sets out the following key development requirement:

4. *Co-ordination with the site allocated for new housing to the west (M4).*

3.6 It is considered that these requirements are sufficient to ensure a coordinated approach to development between the two sites and that further detail is

unnecessary and might reduce the flexibility to respond to the development requirements.

Q4 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?

- 4.1 Yes, it is considered that a safe and suitable to the sites can be achieved.
- 4.2 A Transport Impact Assessment (TIA) was completed for Site M4 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.
- 4.3 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.
- 4.4 The TIA for Site M4 is in INF 09.08 – Transport Impact Assessment Appendix 1 St Stephen (2024). It includes:

3. Access Strategy

Vehicle access from the A405 is not likely to be acceptable in either technical or policy terms. Proposals must demonstrate suitable and safe access to residential areas to the south. Proposals should also be coordinated with the adjacent site (OS1). There is a reasonable prospect that an LTP compliant access strategy allowing safe & suitable access for all modes is deliverable/developable.

Conclusion

There is a reasonable prospect that 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'.

- 4.5 There have been pre-application discussions with HCC and SADC in summer 2025 through which an agreed approach to the access arrangements for both M4 and OS1 has been reached. This work has enabled an access that successfully

addresses the concerns about the effectiveness of potential access from the A405. Therefore there are proposed Main Modifications:

For M4 the key development requirements item 3 is to be replaced:

~~3. No vehicle access from the A405, as this is not likely to be acceptable in either technical or policy terms.~~

New text at item 3:

3. In the event an access is proposed off the A405, full technical details should be provided to demonstrate a safe and suitable access in compliance with current guidance

For OS1 insert a new key development requirement item 2a:

2a. In the event an access is proposed off the A405, full technical details should be provided to demonstrate a safe and suitable access in compliance with current guidance.

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

- 4.6 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.
- 4.7 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 (site M4)

2. *Proposals must demonstrate suitable and safe access to residential areas to the south and not rely on pedestrians walking and cycling along the currently narrow path along the side of the North Orbital road.*
3. *No vehicle access from the A405, as this is not likely to be acceptable in either technical or policy terms.*
4. *Delivery of / Contributions / ~~enhancements~~ to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.*
5. *Support for Improvements via delivery or contributions to existing St Stephens Footpath 029 to be upgraded and improved to enable active travel to the north from Bricket Wood across the M25 and north into the wider network to St Albans.*

6. *Development proposals should take appropriate account of planned upgrades to the J21a bridge as part of the SRFI works, to ensure adequate shared use widths at the northwestern boundary, and the aspirations for a continuous walking / cycling route alongside the A405 (as per the LCWIP and GTPs) between St Albans and Watford*

Key development requirements (site OS1)

2. *The track that connects the site to Woodside Road is narrow and proposals must demonstrate adequate access and egress.*

- 4.8 Overall, the key development requirements alongside policies including LG4 – Large, Medium and Small Sites, and SP14 – Delivery of Infrastructure and are considered sufficiently clear about where and how they would be delivered.

Q5 Are Policies M4/OS1 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 5.1 The site was considered in the round in the site selection work, which included contextualising and balancing the results of the Green Belt Review with other factors. For this location, the site selection outcome is set out across two proforma assessments (Site Ref O-028 and O-029) on pages 34 to 36 in LPSS 02.06 Green Belt Sites Recommended Medium & Small Site Proformas (2024) and on pages 2 to 4 in LPSS 02.08 Green Belt Sites Recommended Other Site Proformas (2024) and as set out in Policies M4/OS1 M7I6Q2.
- 5.2 As set out in Policies M4/OS1 M7I6Q2 above, the Site Selection process set out in LPSS 02.06 Green Belt Sites Recommended Medium & Small Site Proformas (2024) assessed site M4 for potential allocation in the Plan and recommended the site to progress.
- 5.3 As set out in Policies M4/OS1 M7I6Q2 above, the Site Selection process set out in LPSS 02.08 Green Belt Sites Recommended Other Site Proformas (2024) assessed site OS1 for potential allocation in the Plan and recommended the site to progress.
- 5.4 Policies M4/OS1 are 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

- 5.5 Policies M4/OS1 are 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).
- 5.6 Overall, Policies M4/OS1 are considered to be justified, effective and consistent with national planning policy.
- 5.7 N.B. Policy M4 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M15 – Bucknalls Drive

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, Bucknalls Drive, Bricket Wood, AL2 3YT, 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 699 to 701, relating to sub-area 158, states:

Purpose Assessment

Summary

The sub-area performs moderately against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or 4, performs weakly against purpose 2 and performs moderately against purpose 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 is unlikely to significantly harm the performance of the wider Green Belt.

Sub-area category & recommendation

The sub-area performs moderately 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-49.

- 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 36 to 38 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 Policy M15 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 2.1 Yes, it is considered that Policy M15 is justified, effective and consistent with national planning policy.
- 2.2 As answered above in Policy M15 M7I6Q1, Policy M15 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).
- 2.3 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M15 M7I6Q1 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 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 is set out across a proforma assessment (Site ref C-237) on pages 36 to 38 in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) and as set out in Policy M15 M7I6Q1.
- 2.5 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) goes on to further consider the suitability of site M15 for allocation, which states at paragraph 5.4.124:

5.4.124 With regards to Green Belt options, the first point to make is that there is a strategic argument for Green Belt release at Bricket Wood, in light of the appraisal of growth scenarios and consultation on the Draft Local Plan in 2023. However, it is also recognised that as a lower order settlement the strategic argument is inherently limited.

...

Bucknalls Drive (44 homes) – is constrained on account of a LWS designation on three of its four sides, plus Bricket Wood Common SSSI (also open access land) is near adjacent. In this regard, Natural England's consultation response in 2023 stated: "Should this allocation go ahead, Natural England must be consulted and mitigation measures implemented to reduce the likely impacts on Bricket Wood Common SSSI and its interest features." However, the site appears otherwise to be subject to limited constraint, comprising a house set within large grounds (without any clear historic environment interest).

- 2.6 Policy M15 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

- 2.7 Policy M15 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.
- 2.8 Overall, Policy M15 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.
- 2.9 N.B. Policy M15 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.

Policy M23 – Ashdale Lye Lane

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

- 1.1 As set out in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024), the current use of the site is residential and woodland. This is set out in more detail in the qualitative assessment:

Most of the site is designated as a deciduous woodland Priority Habitat, a County Wildlife Site and a woodland TPO.

- 1.2 In further detail, the site is a single large house in large grounds with surrounding woodland.
- 1.3 While the site area is 2.26 ha the environmental constraints resulted in the standard calculation for housing being carried out on only 0.23 ha of the site, with the remainder to be maintained as a deciduous woodland Priority Habitat, a County Wildlife Site and a woodland TPO.
- 1.4 The site was submitted in the Call for Sites 2021 and can be seen in HELAA 04.15 - Annex 15 St Stephen (2021), site reference STS-57-21 where the conclusion was that:

The site is considered be potentially suitable, available and achievable subject to further assessment as part of the site selection process.

- 1.5 The original Call for Sites submission form sent by the agent in 2021 stated:

The Site is available, suitable (currently in residential use on the edge of the settlement of Bricket Wood) and capable of being delivered in the next 1-5 years. The Site is currently in residential use, so there would be no change of use, only intensification of an existing use.

- 1.6 It is considered that Site M23 is available for development within the plan period and the housing trajectory shows site M23 coming forward within the 6-10 year timeframe of the Plan.

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 123, they were:

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength

The inner and outer boundaries of the sub-area 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 moderately 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-45.

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

Northern boundary – Adjoins a well-established woodland edge Bricket Wood Common SSSI and Lye Lane

Northeastern boundary – Adjoins a well-established open green space, Smug Oak Green

Eastern boundary – Adjoins a well-established woodland edge Bricket Wood Common SSSI.

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

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

- 3.1 Yes, it is considered that exceptional circumstances do exist to justify amending the Green Belt boundary in this location.
- 3.2 The strategic case to amend Green Belt boundaries is set out in answer to Stage 1 Matter 3, Issue 3, Question 1 and as addressed in GB 01.01 Green Belt and Exceptional Circumstances – Evidence Paper (2024) 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.*

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, Ashdale Lye Lane, Bricket Wood, AL2 3LQ, 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 556 to 558, relating to sub-area 123, states:

Purpose Assessment

Summary

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

Wider Green Belt Impacts

Summary

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

Sub-area category & recommendation

The sub-area performs moderately 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-45.

3.5 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 39 to 41 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

- 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 Is Policy M23 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

- 4.1 As answered above in Policy M23 M7I6Q3, Policy M23 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).
- 4.2 GB 02.02 - Green Belt Review Report (2023) recommended areas to be considered further for Green Belt release. As set out above in Policy M23 M7I6Q3 the Green Belt Review assessments can be found in GB 02.03 - Green Belt Review Annex Proforma Report (2023).
- 4.3 As set out in Policy M23 M7I6Q3 above, the Site Selection process set out in LPSS 02.06 - Green Belt Sites Recommended Medium & Small Site Proformas (2024) assessed site M23 for potential allocation in the Plan and recommended the site to progress.
- 4.4 Policy M23 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

- 4.5 Policy M23 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)
- 4.6 Overall, Policy M23 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.
- 4.7 N.B. Policy M23 includes proposed Main Modifications as set out in SADC/ED85B and SADC/ED85C.