

St Albans Council's Draft Local Plan Examination

Urgent need for the Council to correct its Matter 3 Hearing Statement

Ref: ELP/HS/0425/SADC.M3

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Summary

1. In its Hearing Statement for Matter 3, the Council has misrepresented the approach Arup took to assessing Purpose 2 of the Green Belt in its 2023 Green Belt Review (Arup GBR).
2. That misrepresentation must be corrected immediately to ensure the public and others are no longer misled into believing Arup's approach was justified.

Villages are not towns

3. In its Hearing Statement for Matter 2 'Housing Growth and Spatial Strategy', the Council included a Table identifying its Settlement Strategy (pages 8-10). The Table identified (emphasis added):
 - one city/large town (St Albans);
 - one town (Harpenden);
 - one small town (London Colney);
 - two large **villages** (Redbourn and Wheathampstead);
 - four medium-sized **villages** (Bricket Wood, Chiswell Green, How Wood and Park Street/Frogmore);
 - seven Green Belt villages (Sandridge, Colney Heath, Lea Valley Estate, Radlett Road (Frogmore), Smallford, Sleepshyde and Gustard Wood); and
 - two Green Belt hamlets (Folly Fields and Annables/Kinsbourne Green)
4. However, in answer to the Inspectors' Q1 in respect of Matter 3 Issue 2, the Council's Hearing Statement wrongly identified some of these villages as towns. Specifically, in the Table included under paragraph 1.2, which set out the methodologies of three Green Belt Reviews, the Council references Footnote 8.
5. Footnote 8 purported to explain how the Arup GBR assessed Purpose 2 of the Green Belt which is *"To prevent neighbouring towns from merging into one another"*. In Footnote 8, the Council stated (emphasis added):

*"The **towns** considered were St Albans, Harpenden, **Bricket Wood, Chiswell Green, How Wood**, London Colney, **Park Street / Frogmore, Redbourn, Wheathampstead**, Luton and Dunstable, Slip End, Hemel Hempstead, Kings Langley, Markyate, Abbots Langley, Watford, Radlett, Hatfield, Welwyn Garden City, and Welham Green (Source: Table 4.7)."*

6. Footnote 8 is incorrect and misleading because Bricket Wood, Chiswell Green, How Wood, Park Street/Frogmore, Redbourn and Wheathampstead are not towns, they are villages. The Council knows this because it identified them as villages in its Settlement Strategy.
7. In its misguided attempt to be more granular than the much-criticised SKM GBR, Arup chose to apply Purpose 2 against certain villages. This was, and remains, non-compliant with Green Belt Policy in which Purpose 2 clearly relates to towns, not villages. To be more granular, Arup was required to look at smaller areas and individual sites, it was not entitled to misapply Green Belt Policy.
8. Until corrected, the Council's Hearing Statement will continue to mislead people into believing that the Arup GBR only assessed Purpose 2 against towns when, in fact, it wrongly assessed Purpose 2 against villages, too.

Urgent Correction of Misleading Statement

9. The Council must acknowledge that Footnote 8 is misleading and a correction must be published on the Local Plan Examination section of its website.

Consequence of Arup's Flawed Approach

10. This is not a minor technical issue. Because the Arup GBR incorrectly applied Purpose 2 to Bricket Wood, Chiswell Green, How Wood, Park Street/Frogmore, Redbourn and Wheathampstead, all sites associated with those villages have been unfairly assessed. If Purpose 2 had been applied correctly, sites which have not been allocated in the Draft Local Plan may have been and vice versa.
11. By treating certain villages as towns, the Arup GBR failed to comply with both the Council's Settlement Strategy and national Green Belt policy rendering the Draft Local Plan unjustified, ineffective and unsound.

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