

# St Albans Local Plan Examination

## Matter 4: The Metropolitan Green Belt (Policy S3)

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**Session Date** Thursday 23 January 2020

**Participant** Lichfields for Legal & General (L&G)

**Our ref** 60885/01/18047979v5

**Date** 12 December 2019

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**1.0 What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? Is the Council's approach to the Green Belt set out in its response to the Inspector's Initial Question 16 and letter of the 2 July 2019 (Green Belt topic paper) robust and in line with national guidance?**

1.1 L&G has no comments on this question.

**2.0 How have the conclusions of the Green Belt Review informed the Local Plan? Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development, and prioritise sites which are previously developed and/or well served by public transport? Where is this evident?**

2.1 SADC adopted a multi stage approach to the assessment of strategic sites, over an extended period of time, most recently presented in reports to the 22 May and 18 June 2018 Planning Policy Committee meetings (as cited in the Green Belt Topic Paper, **ED25C**). Further reporting was presented in July 2018 following the submission of developer proformas to confirm and/or comment on the outcomes of the Council's process. L&G participated in the 2018 verification process in respect of North West Harpenden and in earlier discussions relating to the evaluation and allocation of North West Harpenden in earlier draft plans.

2.2 The most recent 'Strategic Site Selection Evaluations' in 2018 considered the findings of the Green Belt Review as well as a range of other deliverability and sustainability considerations. The North West Harpenden Broad Location was shortlisted for allocation based on a similar exercise in 2014 and retained in the latest draft Local Plan following the 2018 (re)evaluation.

2.3 The conclusions of the Green Belt Review (comprising the Part 1: Purposes Assessment (November 2013); the Sites & Boundaries Study for St Albans (December 2013), and the Sites & Boundaries Study (February 2014) (all by SKM Enviros) **GBoo1 to GBoo4**) have clearly been taken into consideration by SADC in their consideration of Green Belt release and site allocations as part of this evaluation process.

2.4 The Green Belt Review includes detail as to how specific sites are capable of enabling integration into the existing urban area and promoting sustainable patterns of development and this review formed part of the assessment criteria for the site allocations (Section 11, Sites & Boundaries Study for St Albans 2014, **GBoo4**). Further detail on the sustainability and suitability of the site was included within the March 2018 PPC paper and May 2018 PPC paper.

- 2.5 Overall, it is evident that the sites identified for release from the Green Belt have been selected with regard to the need to promote sustainable patterns of development. The allocations, including North West Harpenden, are therefore consistent with the NPPF, and specifically paragraph 138, in this regard.
- 3.0 Has a comprehensive assessment of capacity within built up area been undertaken? Have all potential options on non-Green Belt land in the countryside been assessed?**
- 3.1 L&G has no comments on this question.
- 4.0 Have opportunities to maximise capacity on non-Green Belt sites been taken (including increasing densities)?**
- 4.1 L&G has no comments on this question.
- 5.0 Have discussions taken place with neighbouring authorities about whether they could accommodate some of the identified housing need?**
- 5.1 L&G has no comments on this question.
- 6.0 Does the Plan seek compensatory improvements to the environmental quality and accessibility of the Green Belt?**
- 6.1 Yes, all of the Broad Location (S6) Policies include provision for recreation improvements, green space, planting and/or open space delivery. For example, in relation to North West Harpenden, Policy S6 viii has been drafted to require the retention of important trees and landscape features and the provision of recreation and open space. On this basis improvements to the environmental quality and accessibility of the Green Belt adjacent to this Broad Location have been incorporated into the proposal through the masterplanning process.
- 6.2 This is possible at North West Harpenden as the majority of the site is owned and controlled by L&G as part of a wider land holding which extends beyond the Broad Location allocation. This position provides opportunities for green space improvements and access for recreation in areas adjacent to the allocation which are currently proposed to remain within the Green Belt.
- 7.0 Do the exceptional circumstances, as required by paragraph 136 of the Framework, exist to justify the plan's proposed removal of land from the Green Belt?**
- 7.1 The significant level of longstanding housing need and affordability considerations, when combined with the significant level of Green Belt constraint, justify the removal of land from the Green Belt.
- 7.2 The Council's evidence in the Green Belt Topic paper (**ED25C**, produced at the request of the Inspectors) notes that the issue of 'exceptional circumstances' has been a central issue in the production of the draft Local Plan and was addressed in PPC reports (including March, May and June 2018 meetings) and the Green Belt Review Documents.
- 7.3 Specific to the North West Harpenden Broad Location, the site has been extensively consulted on since 2014, with its inclusion in the draft local plan as a site to help delivery SACDC's

identified unmet housing need supported within the Council's evidence base (which includes Green Belt Review comprising the Part 1: Purposes Assessment (November 2013); the Sites & Boundaries Study for St Albans (December 2013), and the Sites & Boundaries Study (February 2014) (all by SKM Enviros) **GBoo1 to GBoo4**) and the recently submitted Green Belt Topic paper, **ED25C**).

- 7.4 L&G also considers there to be exceptional circumstances which support the removal of at least the area for built development required to deliver the primary school at North West Harpenden from the Green Belt. This land should be removed from the Green Belt alongside the proposed allocation to ensure the need for additional primary education capacity can be met.

## **8.0 Are all the sites and their boundaries clearly shown on a map?**

- 8.1 L&G regards the boundary of the North West Harpenden Broad Location as clearly shown. As noted in L&G's Regulation 19 representations, it should however be made clear that this boundary provides an allocation for development.
- 8.2 It is recognised that, as currently drafted, the 'hatching' and 'N.B' note on the Policies Map seek to clarify that the school site is included within the Broad Location allocation but not removed from the Green Belt. For the reasons noted under Question 7 above, L&G does not consider this approach adequate and believes that the boundary of the primary school site as an area for the development of education facilities at North West Harpenden should be clarified on the Local Plan Policies Map.

## **9.0 Is the approach to secondary school sites in the Green Belt justified?**

- 9.1 L&G has no comments on this question.

## **10.0 Is the approach to transport infrastructure in the Green Belt justified?**

- 10.1 L&G has no comments on this question.

## **11.0 Did the Council consider the designation of safeguarded land in the Plan, and should this be identified?**

- 11.1 L&G has no comments on this question.