

St. Albans City & District Local Plan Examination Matters, Issues & Questions

Response to Matter 4 on Behalf of Canton Ltd

December 2019

Issue - The Metropolitan Green Belt (Policy S3)

Q1. *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 The methodology for the Green Belt Review is not considered to be soundly based. The Green Belt Review in no way provides any information as to the determination of sizes and boundaries of the 66 strategic Green Belt parcels across Hertfordshire; these are intended to be taken as given and, subsequently, pre-determines the patterns of development that would take place should any parcel then be deemed to be contributing least to the Green Belt purposes as set out in Paragraph 134 of the NPPF. They do not accommodate more granular forms of development and, by default, would result in concluding that larger areas of the Green Belt be removed from such classification which would be counterintuitive to the purposes for which they are intended to serve.

1.2 The Review makes the inclusion for an additional purpose of "Hertfordshire" Green Belt which is to "maintain the existing settlement pattern". This has absolutely no basis in national policy and is considered to be unsound therefore. This sentiment has been supported by the examining Inspector for the Welwyn Hatfield local plan, for which this Green Belt Review, and thus its methodology, also supports.

1.3 Given that the purposes should be given equal weighting in the review of Green Belt land, an undue amount of weight has been granted to a fifth, inappropriate purpose for the determination of which land to remove from this designation. As such, the methodology is profoundly flawed and cannot be used for plan-making, or indeed any strategic policies, on this basis. A Review which considers only those purposes which are relevant for determining the significance of Green Belt land parcels in Paragraph 134 should be undertaken which adequately justifies the strategic parcels and the extent to which they serve those purposes.

1.4 Furthermore, the methodology is based upon the definition of terms used in the purposes as outlined in Table 5.1 of the Final Report of the Green Belt Review. While potentially vague terms, such as "sprawl", are defined as according to the Oxford Dictionary, others such as "large built-up areas" have been inappropriately defined as London, Luton, Dunstable and Stevenage on the basis that the outward expansion of these locations "was controlled as an original purpose of the Green Belt".

1.5 It is in fact the current purposes and functions of the Green Belt which must be considered, in the context of the 2019 NPPF; indeed, today Green Belts can be found across the country beyond London's reach, where the use of Green Belt land was first employed. Hence, the exclusion of St. Albans from the definition of large built-up areas is unjustified; the Office for National Statistics' household projections from mid-2016 to mid-2041 demonstrate St. Albans is substantially larger than Stevenage in 2016 by household numbers by approximately 22,000. Projections for the year 2036 estimate this difference in absolute numbers to persist. It is unclear, then, why St. Albans is not considered to be a large built-up area but Stevenage is for the Review which would fundamentally alter the interpretation of the purposes set out in Paragraph 134.

1.6 Taking the above together, we are of the position that the methodology is inherently flawed and, indeed, would appear to arbitrary and unjustified in its approach to the assessment of Green Belt land parcels. Consequently, the Green Belt topic paper which

details the Council's approach is equally unsound as, by their own measure of employing the Calverton case's paragraph 51 criteria, the Green Belt Review allegedly addresses both the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent. The matter of fact is that it does not for the reasons discussed above.

Q2. *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 Policy S1 details the Spatial Strategy and Settlement Hierarchy, which sets out that the hierarchy gives priority to larger urban centres. It follows, then, a greater proportion of development will be focused in higher category settlements, but equally a smaller proportion should come forward in lower category settlements. However, the flawed findings of the Green Belt Review support strictly large-scale growth, to include substantial urban extensions to St. Albans to the north and the east, which cannot be considered sustainable patterns of development. The lack of granular parcels assessed as part of the Review have limited the manner in which the Local Plan may have supported small-scale growth in otherwise suitable locations to support smaller and rural communities across the district.

2.2 Furthermore, Green Belt releases do not reflect the need to promote sustainable patterns of development. An opportunity exists for the Council to provide development opportunities for lower category settlements - certainly, where it is claimed that category 3 settlements are in locations which make an important contribution to the Green Belt would apply equally to larger order settlements which are *also* in locations that make an important contribution to the Green Belt, thus the need for a Green Belt Review. In any case, the Local Plan almost entirely overlooks the opportunities for smaller sustainable patterns for development, instead limiting these to infilling in very specific circumstances.

2.3 It is neither considered that the recommended Green Belt releases prioritise sites which are previously developed and/or well served by public transport, in accordance with Paragraph 138 of the NPPF. The newly proposed settlement of Park Street Garden Village would require entirely new infrastructure to support development on Green Belt land. We are of the position that whilst any development that would come forward may make adequate *new* provision for sustainable transport, any such provision for new settlements or large urban extensions would by default bypass this prerequisite for utilising *existing* public transport.

2.4 As such, the Broad Locations for which it is proposed that Green Belt land should be released do not capitalise on existing transport infrastructure and would, by virtue of their size, require entirely new provision altogether.

Q11. *Did the Council consider the designation of safeguarded land in the Plan, and should this be identified?*

11.1 There is no safeguarded land in the Plan, whatsoever. Any release from the Green Belt has site allocation(s) and therefore fails to consider the manner in which the releases may

persist beyond the currently proposed plan period. This is not consistent with national policy in the NPPF and also results in a Plan that is not an appropriate strategy when assessed against the reasonable alternative of including some safeguarded land to provide a fallback position were one or more the proposed Broad Locations not to deliver as expected, which seems highly likely. The safeguarded land could be released at a trigger point in terms of delivery rates dropping to a particular level, providing additional supply to help make up for any shortfall.

- 11.2 This is especially the case for the smaller category settlements which are very limited in the ways in which development can meet their future growth over this plan period as the Plan is currently draft, let alone any that will follow. It is absolutely critical that land be safeguarded such that any growth in these settlements can be adequately facilitated in accordance with national policy, particularly Paragraph 78 of the NPPF which seeks to maintain and enhance the vitality of rural communities via planning policies that identify opportunities for villages to grow and thrive.
- 11.3 It is considered that restricting settlements such as Colney Heath to limited infilling and development of previously developed land will not sufficiently meet its needs over the coming decades. It is crucial that more discrete parcels of Green Belt land are assessed against only the relevant purposes outlined in the NPPF to fully and comprehensively realise the sustainability of development across the District to ensure the needs of rural communities can be, and are, met.



Woods Hardwick

Architecture | Engineering | Planning | Surveying

BEDFORD : HEAD OFFICE

15-17 Goldington Road
Bedford MK40 3NH
T: +44 (0) 1234 268862

BIRMINGHAM

Fort Dunlop, Fort Parkway
Birmingham B24 9FE
T: +44 (0) 0121 6297784

ONLINE

mail@woodshardwick.com
woodshardwick.com