

ST ALBANS CITY AND DISTRICT LOCAL PLAN 2020-2036 (CD 002)

EXAMINATION HEARING POSITION STATEMENT

MATTER 4 – THE METROPOLITAN GREEN BELT (POLICY S3)

December 2019

ST ALBANS CITY AND DISTRICT LOCAL PLAN EXAMINATION

Matter 4 – The Metropolitan Green Belt (Policy S3)

1.0 Introduction

1.1 PPML Consulting Ltd are instructed by ERLP1 Sarl to submit this Hearing Position Statement to the Examination for the St Albans District and Local Plan 2020-2036. Previous submissions on behalf of our clients have been made in response to the St Albans Local Plan 2020-2036 Issues and Options Regulation 18 in February 2018 together with submissions on the Call for Sites. Representations have also been made at the Regulation 19 stage Publication Plan in October 2018. The hearing statements should be read alongside the representations already submitted.

1.2 This Hearing Position Statement responds to questions set out in ED26 (Stage 1, Matters, Issues and Questions).

2.0 MATTER 4 – THE METROPITAN GREEN BELT (POLICY S3)

2.1 **Q 2 - 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?**

2.1.2 The Councils Green Belt evidence base (Part 1 GB004) was produced in 2013 and reviewed in 2014 (Part 2 GB001). It is not consistent with the advice in the NPPF at paragraph 138 where it states that *‘where it has been concluded that is necessary to release Green Belt land for development, plans should give first consideration to land which was previously developed previously developed and/or is well served by public transport’*.

2.1.3 The Councils Green Belt Topic Paper (EDC25C) paragraph 1.5 suggest that the total capacity from urban sites is 5000 dwellings, a significant shortfall of the 14,608 homes resulting from the Government’s standard methodology for housing need. The Council stipulate that this scale of unmet need can only be addressed by Green Belt release. Having got to that position, the Council has not sought to undertake an update of the Green Belt evidence base to accord with the provisions of National Policy specifically paragraph 138. The entire Topic Paper and indeed the evidence base appears devoid of any rational application of up to date national policy in this regard.

- 2.1.4 The Plan should give first consideration to land that has been previously developed in the Green Belt and/or is well served by public transport. This is not evident in the Green Belt Review commissioned by the Council. It has not been robustly demonstrated through the SA that the proposed option of releasing 8 large Broad Location sites is the most effective method of meeting the needs of the District and, as we have commented in our Regulation 18 and 19 submissions, we consider that the Council should specifically include smaller sites in the context of paragraph 138 of the Framework and that this should form part of the Inspector's recommended Main Modifications to the Plan.
- 2.1.5 The land at Hanstead Park is previously developed land and covers approximately 20.35 ha ('PDL') within a wider area of undeveloped landholding that is in the control of the owner. The total area of the wider landholding is approximately 10 ha (referred to as Parcels A and B Appendix 1 as submitted in the Regulation 19 representations).
- 2.1.6 This landholding represents a sizeable area currently washed over by the Green Belt which can make a significant contribution towards to the Councils housing land supply. The owner has made previous submissions to the Council on its Draft Strategic Local Plan (Regulation 18) and has also made a submission to the Councils 'Call for Sites' alongside the Regulation 19 Consultation process.
- 2.1.7 The sites location close to Bricket Wood and close to the new development proposed at Hanstead Park means that the site is within close proximity to a wide range of existing facilities in the local area. Importantly the sites are within a 10-minute walk to Bricket Wood Rail station which provides a service every 45 minutes during the weekday. This service takes 8 mins to travel to Watford Junction which is a transport hub and provides connections to central London and Milton Keynes and 8 minutes to St Albans Abbey station thus providing access to a wider choice of services and amenities by non-car mode.
- 2.1.8 This land is in single ownership and is available and deliverable now so can make an immediate contribution to the Councils Housing requirements and can certainly contribute to the Councils 5-year housing supply.
- 2.1.9 The Hanstead Park landholding parcel A adjoins land that is previously developed and for which planning permission has been granted for 138 dwellings. Parcel B lies to the north of Smug Oak Lane and is not previously developed land but it does lie within a few minutes walk

of Bricket Wood Station on the Abbey line as well as a bus route. Both these sites would find support in the NPPF paragraph 138 as sites well served by public transport.

- 2.1.10 The NPPF defines five purposes of Green Belt which we have assessed the two parcels of land against to establish the extent of conflict with those purposes and integrity to justify that the sites should be removed from the Green Belt and allocated for housing in the Plan.

Purpose 1 - To check Unrestricted Sprawl of Large built- up areas

- 2.1.11 Parcel A is well contained with strong boundaries to the north formed by the rear gardens of existing dwellings on Smug Oak Lane and Smug Oak Lane itself. The parcel is quite well contained to the east, west and south by trees/woodland and hedgerows.
- 2.1.12 Parcel B has strong defensible boundaries to the west, north and south and a hedgerow to the east. We consider that both Parcels A and B are of low importance with respect to Purpose 1.

Purpose 2 – To prevent neighbouring towns from merging into one another.

- 2.1.13 The removal of Parcels A and B from the Green Belt would result in a very limited reduction in the existing gap with Bricket Wood. There is limited vulnerability to visual coalescence at a local scale as a consequence of the strong boundaries within which the parcels are contained. We consider that the two Parcels are of low importance with respect to Purpose 2 of the Green Belt.

Purpose 3 – To assist in safeguarding the countryside from encroachment

- 2.1.14 Both Parcels A and B are undeveloped and therefore largely open in character. This however should be considered against the Purpose 1 assessment, which also reflects the role that boundaries can play in preventing encroachment both physically and visually. In that assessment Parcel A has strong boundaries and thus can prevent encroachment. In terms of visual encroachment, Parcel A does not form part of the wider countryside fabric. It is very much an isolated, well contained area of land. There are no long-range views of the land parcel where it can be appreciated to be part of the wider countryside because of its strong boundaries. We therefore consider that parcel A is of lower importance to purpose 3 of the

Green Belt. Parcel B does possess strong boundaries but viewed across from the west along Smug Oak Lane can be seen as part of the wider countryside fabric. Parcel B therefore makes a low to moderate contribution towards Purpose 3 of the Green Belt.


Purpose 4 – To preserve the setting and special character of historic towns

- 2.1.15 The historic town of St Albans will not be affected by development of the two Parcels and is therefore of lower importance to Purpose 4 of the Green Belt.

Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 2.1.16 Given that the Councils strategy to accommodate future housing growth requires substantial removal of land within the Green Belt, all the parcels of land should be assessed as having low importance against this purpose.
- 2.1.17 Our assessment demonstrates that Parcels A and B are of low importance and value to the purposes and integrity of the Green Belt and as a consequence the degree of harm which would arise should they be released would be low. Parcel A makes a low contribution to all 5 purposes and Parcel B makes a low contribution to 4 of the purposes and a low/moderate on one purpose. None of the Parcels make a higher contribution to any purpose. We therefore consider that both parcels should be taken forward for release due to their limited contribution which would not conflict with the purposes of the Green Belt as set out at paragraph 134 of the Framework.
- 2.1.18 Given that the Council needs to release green field Green Belt land we wholly support the release of the wider landholdings at Hanstead Park (Parcels A and B) which amounts to circa 10 ha which could support in the region of 350 dwellings (Parcel A – estimate 70 dwellings, Parcel B – 280 dwellings at an average of 35 dwelling per hectare).
- 2.1.19 We consider that large scale sites as envisaged in the majority of the broad location sites will not have the ability to delivery housing in the first five years of the plan and consequently the Council must identify and release smaller green belt sites that can make an immediate contribution to the supply of housing.



▲ Parcel A – 
Parcel B | 