

Matter 4: The Metropolitan Green Belt (Policy S3)

STATEMENT ON BEHALF OF CP Holdings Ltd (ID 1158145)

- 1.1 WYG is responding to the Inspector's questions raised under Matter 4 – The Metropolitan Green Belt (Policy S3).
- 1.2 WYG is representing CP Holdings Ltd, who is the owner of a large site adjacent to the boundary of the St Albans built up area. The site corresponds to a southern section of Green Belt Assessment Site GB24B – as per the site plan appended to this statement. Roads and development form a hard boundary on every side. The total site area available ultimately is approximately 137ha but it is capable of being apportioned into phased smaller to medium sized sites. It is easily accessible to local facilities (Abbey Avenue local parade 400m away; Waitrose 1km away; Prae Wood Primary School 800m away). The site is presently in the Green Belt but is capable of providing a suitable and sustainable location for housing, helping to meet the housing need in the short to medium term.
- 1.3 This Hearing Statement builds on earlier representations submitted on the Regulation 19 version of the Local Plan.

1. 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?

- 1.4 The Council's Green Belt methodology has a number of issues in the way it has been applied, with the result that potentially suitable – and even preferable – sites for release have been discounted.
- 1.5 The Council has included its own 'local' Green Belt purpose, in addition to the five purposes as set out in paragraph 133 of 134 of the NPPF (Green Belt Review paragraph 5.2.4). This purpose, to maintain the existing settlement pattern, is not consistent with national policy and seeks to extend an existing Green Belt purpose ie. to prevent neighbouring towns from merging. Not only is this unnecessary, it skews the assessment to reject some sites that may have been acceptable if considered properly under the five NPPF Green Belt purposes. As an example, the site being promoted by CP Holdings Ltd was assessed as part of site GB24B. Regarding the NPPF purpose to prevent towns merging, the assessment stated that any minor reduction in the gap would be unlikely to affect this purpose. However, in the consideration of the local purpose, it was considered that *"any minor reduction would be likely to compromise the separation of settlements..."* Clearly, the addition of the local purpose here disqualified the wider parcel and

any smaller sites within this from further consideration. This is not in line with national policy, where it is intended that the Green Belt is a strategic tool of planning policy.

- 1.6 The Council has applied a three-stage RAG approach for assessing sites. The first stage of assessment draws on the outcome of the 2013 Green Belt Review to evaluate a site's contribution to the Green Belt. This is followed by stage 2, which assesses suitability and availability, and stage 3, which assesses a site's contribution to public services and facilities, job opportunity enhancement, infrastructure/community provision, deliverability and achievability. If a red rating is given at stage 1 or stage 2, the site is ruled out for further consideration. Using the example above, where sites had been potentially unnecessarily ruled out at stage 1, they were given no further consideration.
- 1.7 In relation to the identification of smaller sub-areas, the Review itself confirms that those identified "*may not be exhaustive*" and goes on to say that additional small scale boundary changes would be possible without compromising the Green Belt purposes (Green Belt Review 2013, Paragraph 8.1.15). The Review itself implies there was a need for a more detailed stage of assessment. This is also picked up in the Sustainability Appraisal where further review of smaller scale sites was discounted, stating "*This would necessitate more work on detailed Green Belt Boundaries to see what might be appropriate as smaller scale alternatives in some selected locations*"(p.36). The failure to conduct a detailed review of smaller sites should not be given as a basis for the Council's chosen focus on larger strategic sites.
- 1.8 It is even more concerning that the few smaller sites identified at stage 1, somewhat arbitrarily, were then ignored totally in the second part of the assessment. No reason is given other than that this was outside of the scope of the study. The second part of the assessment went on to consider only the strategic sub-areas. In response to Inspector's questions, the Council responded in ED25C that "*The consideration was based on a judgment that the strategic scale sites offer infrastructure and community benefits in a way that small sites do not*" (paragraph 1.24). This decision making appears perverse; small sites would not usually deliver benefits such as strategic infrastructure but only because it is less likely to be required to make development acceptable, in line with the NPPF. While unlikely to provide the scale required to support large infrastructure items, all development would be required to contribute to and enhance local infrastructure to support population growth. Moreover, if these small sites were located sustainably in close proximity to Category 1 settlements they would be less likely to have such requirements. Where deemed appropriate, provision of supporting infrastructure is not a 'benefit'; it is a necessity.
- 1.9 To use the site within GB24B as an example again, the location adjacent to St Albans while making it highly sustainable, will reduce the likelihood of strategic infrastructure provision being required on site. In this case, a highly sustainable and suitable site for release, which could

deliver small to medium scale development to support short term housing growth, would have been discounted due to the various failings in the Green Belt methodology. This example is just one site – the impact to the overall growth strategy is clearly more significant.

- 1.10 There is also evidence of inconsistency across the site evaluations. By way of example, there appear to be contradictory remarks whereby the "visual gap" between St Albans and Chiswell Green from the A414 is described as "limited" under GB25, but is described as "strong" under GB24B. Subsequently, a strategic sub-area in GB25 (SA-8) was reviewed further, while no further assessment of GB24B was undertaken.
- 1.11 In conclusion, the Green Belt methodology is not robust and has failed to allow the further consideration of some suitable sites and particularly smaller sites for release. In the consideration of harm to the Green Belt, some of the selected larger sites are more likely to do harm than smaller sites. This essential failing of the Green Belt methodology has been reflected in the Council's wider strategy for growth, which seeks to gain benefits from larger strategic but not necessarily sustainable development and does not give adequate weight to alternative patterns of growth. A further Green Belt Review should be undertaken to re-assess the various parcels dismissed and to identify smaller sub-areas, using a methodology that is consistent with the NPPF.

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?

- 1.12 The identification of the broad locations for Green Belt release have been translated into Local Plan policy. However, the smaller sub-areas identified in the first stage of the Review were then dismissed from the assessment process and have been subsequently ignored in policy-making.
- 1.13 The need to reflect sustainable patterns of development does not appear to have been a priority, and more weight has been given to the supposed 'benefits' of infrastructure provision. St Albans, a Category 1 settlement, should be a key focus for growth. However, only two Green Belt sites have been identified for release around St Albans – both of which are strategic sites of >1,000 units requiring significant new infrastructure to be delivered to support development. The Council should conduct a robust Review of small and medium Green Belt sites, prioritising those in sustainable locations adjacent to Category 1 settlements.

7. 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?

- 1.14 Exceptional circumstances have been demonstrated by the Council which justify the proposed removal of land from the Green Belt. However, the Council have introduced an additional justification relating to infrastructure contributions (ED25C paragraph 1.24 and 3.26). As stated under Question 2, the prioritisation of this 'benefit' has led to the disqualification of smaller sites from further review and potential release. The provision of infrastructure as part of development should be as required to make a development acceptable – not an additional 'benefit'. Such reasoning has promoted a Local Plan strategy for growth and Green Belt release that focuses on a few large strategic sites that do not necessarily create sustainable patterns of growth. The Council should assess additional sites for release from the Green Belt using a justification that is consistent with national planning policy, and gives proper weight to suitability and location and is not dictated entirely by an assessment of its 'contribution'.

Lucy Farrow

Principal Planner

WYG

Hearing Statement in Relation to the Independent Examination of The St Albans Local Plan

SITE PLAN

Whole available site area

(as submitted under our Regulation 19 representation)



Smaller potential sub-area for early development

