



Written Statement Responding to Inspector's Questions

Matter 4: The Metropolitan Green Belt

Examination of the St Albans Local Plan 2020-2036

Prepared on behalf of CastleOak Care Communities

Respondent I.D: 1187716

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Matter 4: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall approach to the Green Belt [Policy S3]

- 1.1. This Statement provides Castleoak's response to the Inspector's Questions relating to the approach to Green Belt matters, set out in the Submission Stage Draft St Albans Local Plan. It generally is broadly reflective of submissions made by other organisations at the Submission Stage of the Local Plan.
- 1.2. This Statement should be read in conjunction with Castleoak's objections to the St Albans's Proposed Submission Local Plan consultation (17 October 2018). A number of principal objections were made in respect of draft Policy S3 (Green Belt).
- 1.3. The Council through its Development Strategy accept that it cannot meet its future housing requirements noting that 81% of the land in the district is Green Belt. The district is relying on the release of land within the Green Belt to deliver most of its objectively assessed housing need of 14,608 dwellings (913 dwellings per annum) between 2020 and 2036. Accordingly, it has identified Broad Locations for Growth under draft Policy S6 to deliver circa. 10,085 dwellings through the delivery of large scale strategic urban extensions over the plan period i.e. circa 69% of its overall housing need with the balance of 4,523 to made up through the delivery of windfall sites.
- 1.4. Whilst Castleoak fully endorses the release of land within the Green Belt to meet future need, the strategy is fundamentally flawed because Policy S3 fails to determine which site or sites would best meet the identified need having regard to Green Belt harm and other relevant considerations. It is only after satisfactory completion of this stage that exceptional circumstances are capable of being fully demonstrated.
- 1.5. The overriding concern is that the proposed approach to the Green Belt is not justified, effective or consistent with national policy, as there are specific concerns in respect of the approach to identifying appropriate land for release from the Green Belt.
- 1.6. The broad thrust of the objections relate to the failure of the local authority to identify sufficient housing land to meet its needs, and that land at Burston Garden Centre, St Albans, should be released from the Green Belt and allocated to assist in addressing this need.
- 1.7. The site is considered to meet all of the attributes that would justify release from the Green Belt noting that development of the site for elderly persons housing would:
 - Address significant housing need (delivery of circa 189 care beds);
 - Represent a redevelopment of a site that would not undermine the purposes of keeping land within the Green Belt;
 - Represent development of a site well contained within the landscape, albeit noting its location close to a listed building; and

- Have associated social economic and environmental benefits.

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?*

- 1.8. Whilst it is recognised the District is constrained by the Green Belt designation, Green Belt is a policy designation that can be adjusted and removed, in exceptional circumstances, from land by the local planning authority as part of the preparation or review of a Local Plan.
- 1.9. The Council's approach to Green Belt release focusses on allocating only a small number of large, strategic Green Belt sites, resulting in the overlooking of a number of more sustainable edge of settlement locations which could cumulatively contribute significantly to meeting the Council's housing and other needs. It is held that the Council's approach to considering Green Belt sites is not robust or consistent with national policy. Indeed it ignores much of its own commissioned evidence base on its Green Belt to inform its Local Plan including:
- GB001 Green Belt Review Sites and Boundaries Study February 2014;
 - GB004 Green Belt Review Purposes Assessment Final Report November 2013; and
 - GB006 Green Belt Review Purposes Assessment Annex 1 – Parcel Assessment Sheets for St Albans City & District Council' November 2013
- 1.10. The final report was completed in February 2014 and was commissioned by St Albans City & District Council (SADC) to undertake a Green Belt Sites and Boundaries Study with the following primary objectives:
- To identify potential sites (with boundary lines) within allocated strategic sub-areas for potential release from the Green Belt for future development;
 - To estimate the potential development capacity of each site; and
 - To rank the sites in terms of their suitability for potential Green Belt release.
- 1.11. Document GB006 forms an Annex to the Green Belt Review Purposes Assessment relating to St Albans City and District Council specifically. This study identifies areas of land which contribute least towards the objectives of the Green Belt.
- 1.12. Land at the Burston Garden Centre provides a good example of how the Council have ignored its own commissioned evidence base. Parcel 26 on the 'Strategic Parcel Plan' incorporates Burston Garden Centre. The assessment of the site under GB006 concludes that the site has only a limited contribution to the National Green Belt purposes (paragraph 134 of the NPPF) and accordingly, the Council should have applied greater weight to regarding the site favourably for a housing allocation.

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?

- 1.13. The Inspector's Question 2 goes to the heart of our concerns on the Council's approach to Green Belt matters, as it is held that the Council's approach to assessing sites and understanding the exceptional circumstances present in the District is flawed and non-compliant with national policy.
- 1.14. As set out within Question 16 of the Inspector's initial questions to the Council of 17th April 2019, there are two stages to a Green Belt review process. The Council's response to the Inspector's initial questions (dated 24th May 2019) reproduces text provided in a Committee Report to the Planning Policy Committee from March 2019. This indicates at Paragraph 4.14 that there is evidence to demonstrate that the test for 'exceptional circumstances' requiring alteration to Green Belt boundaries as set out in the draft Local Plan has been made.
- 1.15. Castleoak do not disagree with the conclusion that some alterations to Green Belt boundaries are required. However, pertinently, the Council's response provides no detailed justification in respect of the second stage – (ie the determination of which site or sites would best meet the identified need having regard to Green Belt harm and other relevant considerations). This relates back to NPPF Paragraph 138 (in respect of reviewing Green Belt boundaries), which states:

*'... Where it has been concluded that it is necessary to release Green Belt land for development, **plans should give first consideration to land which has been previously-developed and/or is well-served by public transport**....'* [our emphasis]
- 1.16. Within the Council's response of 24th May 2019, some specific comments are offered by the Council seeking to provide justification that exceptional circumstances have been demonstrated for the allocation of the Park Street Garden Village. However, the general approach is not considered in detail.
- 1.17. As indicated within our letter of 17th October 2018, the Council's methodology did not consider the Burston Garden Centre site in any detail given the combined factors of its location in the Green Belt, and as it was not of a strategic scale. This approach is clearly contrary to Paragraph 138 of the NPPF.
- 1.18. As indicated above, the Council's approach has exclusively focussed on allocating only a small number of large, strategic Green Belt sites. In doing so it has overlooked the potential to consider allocation of a number of more sustainable edge of settlement and well connected sites, and sites wholly or partially comprising previously developed land, which could cumulatively contribute significantly to meeting the Council's housing and other needs.
- 1.19. For the reasons above, it is held that the current approach has resulted in the artificial suppression in the identification of suitable sites (notwithstanding the existing Green Belt designation) which if properly assessed and planned for as part of the emerging Local Plan would ensure delivery of sustainable development that meets the District's minimum needs.

- 1.20. For clarity, the Site at Burston Garden Centre could make a significant contribution to the Council's need for older persons accommodation (which also contributes to housing requirements generally). Against NPPF criteria and specifically Paragraph 138, the site comprises a sustainable location for new development, and the CastleOak proposals themselves comprise a sustainable form of development. Much of the site is currently covered by buildings and hardstanding, and whilst it is accepted that some of the site remains undeveloped, much this development comprises 'permanent structures' for the purposes of the definition of previously developed land. The site is also served by public transport with local bus stops very close by, and How Wood railway station also within walking distance.