

**St. Albans City and District Local Plan  
Examination Hearings**

**MATTER 4**

**Thursday 23<sup>rd</sup> January 2020**

**Statement by Jed Griffiths MA DipTP FRTPI  
On Behalf of CPRE Hertfordshire**

**December 2019**

## Introduction

1. This statement has been prepared by Jed Griffiths MA DipTP FRTPI on behalf of the Campaign to Protect Rural England, Hertfordshire (CPREH). It has been compiled in response to the invitation by the Examination Inspectors to submit further material on the matters to be considered at the hearing sessions. This statement addresses the Issues and Questions under Matter 4 – The Metropolitan Green Belt (Policy S3).
2. Earlier representations were made by CPREH to the Publication Draft of the Local Plan against policy S3. The purpose of this statement is to amplify the points made at that time, and to address the specific issues and questions set out by the Inspectors in the agenda (Document ED26). Not all the questions will be answered in full – the focus will be on those issues and questions which are relevant to the case made by CPREH.
3. In its earlier representations, CPREH considered that policy S3 was neither justified nor consistent with national policy as set out in the National Planning Policy Framework (NPPF). In terms of the Green Belt policy, the Local Plan is clearly unsound.

**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<sup>nd</sup> July 2019 (Green Belt Topic paper) robust and in line with national guidance?**

4. CPREH notes that the Green Belt Review was carried out in two stages by SKM consultants. The first involved the preparation of a joint study, Green Belt Review: Purpose Assessment for Dacorum, St. Albans and Welwyn Hatfield (Document GB004), published in November 2013. The second report – Green Belt Review: Sites and Boundaries Study (Document GB001) – was issued in February 2014. Since the publication of these reports, adjustments have been made to the National Planning Policy Framework. These changes have not been fully taken into account by the Council.

5. The Inspectors' letter to the Council of 2<sup>nd</sup> July 2019 (Document ED23) asked for a further Green Belt Topic Paper. In the Council's response (Document ED25C), there was an attachment on Green Belt policy and how it had been interpreted. In the view of CPREH, there are still questions to be asked about the Council's approach. The main drivers of the Council's policy appear to be based on the earlier call for sites and the Strategic Housing Land Availability Assessment (SHLAA).

**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 movement, and prioritise sites which are previously –developed and/or well-served by public transport? Where is the evidence?**

6. From the Council's response to the Inspector's letter, they are of the firm view that the conclusions of the Green Belt Review have informed the Local Plan and the allocation of many of the broad locations for development. As pointed out by the Council's consultants (in GB004), the Green Belt Review is only one piece of evidence. It seems curious that the Council seems to have accepted the initial nine sites as suitable locations for development. There seems to have been no critical examination of the suitability of these sites in terms of access to public transport or other facilities and services,
7. The addition to the plan of the Park Street Garden Village proposal does not seem to have been part of the Green Belt Review. Its inclusion seems to have been based partly on the results of the "call for sites" exercise, and partly as a result of the consent for the development of the site for a Strategic Rail Freight Interchange. This decision, opposed by the Council, was made in the national interest – it does not establish the area as a brown field site.
8. The opportunistic decision of the Council to promote the Park Street Garden Village is contrary to Green Belt policy. No account has been taken of its strategic location to the south of St. Albans in an area subject of urban fringe pressures. These include fragmentation of farm land, former sand and gravel extraction, isolated industrial sites, power lines, and the M25 motorway. It is an area where the Green Belt needs protection and enhancement. As most of the area was within Hertsmere Borough, it was not subjected to the earlier Green Belt Reviews.

9. In terms of public transport accessibility, the Local Plan seems to have referred to the location of the Garden Village and the proximity of Park Street station on the Watford Junction to St. Albans Abbey branch line. There is no mention of the possibility of a station at Napsbury, on the Midland main line. CPREH understands that this has been under discussion with Network Rail, Hertfordshire County and the local authorities.

**Q3. Has a comprehensive assessment of capacity within built-up areas been undertaken? Have all potential options on non-Green Belt land in the countryside been assessed?**

**Q4. Have opportunities been taken to maximise capacity of non-Green Belt sites been taken (including maximising densities)?**

10. The Council maintains that a comprehensive assessment has been undertaken of the capacity of built-up areas in the District. They have concluded that this falls far short of the Objectively-Assessed Housing Needs (OHN) figure of 14,608 dwellings. In its statement on Matter 3, CPREH has made it clear that this figure is far too high in the light of the latest household projections. As the Council have pointed out, there are no options for development on non-Green Belt land in the countryside – the entire area, outside of the towns and large villages, is designated as Green Belt. Nevertheless, CPREH believes that more work should be done on the capacity of existing developed areas, including those that could be regenerated or redeveloped and where the existing land uses do not make the most optimal use of precious areas of previously-developed land. This is a key requirement of the NPPF paragraph 137, yet the Council seem to have been content to rely almost entirely on offers of land for development from landowners and prospective developers. Similarly, little or nothing has been proposed in the Plan on the raising of densities on urban sites which would be suitable for apartments. Here, densities of more than 100 dwellings per hectare are not inappropriate.

**Q5. Have discussions taken place with neighbouring authorities about whether they should accommodate some of the identified housing need?**

11. In their response to the Inspector's letter, the Council have stated that they have had discussions with neighbouring authorities about accommodating some of their housing need. They report that discussions had not produced any positive replies. Nevertheless, it seems obvious that negotiations must have taken place with Dacorum Borough Council about the allocations of land adjacent to Hemel Hempstead.

**Q6. Does the Plan seek compensatory improvements to the environmental quality and accessibility of the Green Belt?**

12. Policy S3 is deficient in that it does not positively seek compensatory improvements to the quality and accessibility of the Green Belt. There is merely a list of general intentions.

**Q7. 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?**

13. CPRE is firmly of the view that the plan does not provide the exceptional circumstances to justify the removal of land from the Green Belt. The NPPF, paragraph 136, states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The following paragraph (137) states that, before concluding that exceptional circumstances do exist, the strategic planning authority should demonstrate that it has examined all reasonable options. This should include an assessment as to whether the strategy has made as much use as possible of suitable brownfield sites and under-utilised land; optimised densities, and; been informed by discussions with neighbouring authorities as to whether they could accommodate some of the identified need. As stated above in paragraph 10, it is clear that the Council has not investigated how or where existing brownfield land can be used for housing. CPREH would respectfully remind the Inspectors that this investigation should cover all previously-developed land, not just those sites which are derelict or vacant.
14. The NPPF (paragraph 138) also stresses the need to promote sustainable patterns of development. Plans should give first consideration to land which has been previously-developed or is well-served by public transport. Having regard to the requirements set out in the NPPF, CPREH considers that these have not been fully included in the determination of the overall strategy. As stated above, it appears that the strategy has been driven mainly by the call for sites. More work should be done on the potential optimisation of densities in the urban areas before exceptional circumstances can be said to exist in order to remove land from the Green Belt.

**Q8. Are the sites and their boundaries clearly shown on a map?**

15. The proposed development sites and their boundaries should be clearly shown on the Policies Map, including at the proposed Park Street Garden Village, if this should be found to be sound by the Inspectors.

**Q9. Is the approach to secondary school sites in the Green Belt justified?**

16. As stated in policy S3, schools, which are inappropriate Green Belt development under national policy, have nevertheless been successfully provided and retained in the Green Belt in numerous locations over many years. Very special circumstances will have been demonstrated for doing so. CPREH strongly advocates the retention of the existing policy, whereby both the area of the school buildings and the grounds are designated as Green Belt. If this is not done, the built-up part of the site could become subject to development speculation. The approach suggested in policy S3 is not justified. Reference to schools sites should be deleted from the final paragraph of the policy.

**Q10. Is the approach to transport infrastructure in the Green belt justified?**

17. The policy S3 is correct in stating that transport is a key element of infrastructure – this is compatible with the NPPF at paragraph 146 (c). The reference to transport in policy S3 merely duplicates the NPPF.

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

18. It is apparent that no consideration of safeguarded land has been made in the Local Plan, as advised in paragraph 139 of the NPPF. The NPPF clearly states that, if necessary, safeguarded land should be shown. CPREH is greatly concerned about the rapidly changing spatial context for the Local Plan. This includes mounting uncertainties over the likely household projections, and potential changes to both social and economic trends between the UK and the rest of Europe. In this period of uncertainty, the Green Belt should not be sacrificed on the basis of unpredictable long-term needs beyond the plan period. Such long-term needs can and should be assessed in the first review of the Local Plan. At that time, many of the present uncertainties will have been resolved and the implications of more up-to-date information, including the 2021 Census results, can be objectively-assessed.

**Additional Points**

19. The fourth bullet point in the third paragraph of policy S3 is incompatible with the final paragraph and the NPPF (paragraph 145). The bullet point should therefore be changed to “provide spaces for outdoor sport and recreation.”

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10<sup>th</sup> December 2019