

EXAMINATION OF THE ST ALBANS CITY AND DISTRICT LOCAL PLAN, STAGE 1

MATTER 1 - LEGAL COMPLIANCE

HEARING STATEMENT OF LIGHTWOOD STRATEGIC

Issue 3 – Sustainability Appraisal

Q4 What is the justification for treating the Hemel Garden Communities ('HGC') "as a constant" in paragraph 5.4.23 of the SA? What alternatives to the HGC have been considered as part of the plan-making process?

This question reflects observations that are presented on page 18 of Lightwood's Regulation 19 representations, which should be referred to for our full answer.

To defend/justify the choices made during the sustainability appraisal process, the Council will have to take the position that it is only rational to assess the eastern growth of Hemel Hempstead, within St Albans district, as a total package (under the banner of HGC). It has taken an 'all' or 'nothing' approach in SA terms. It will have to rationally argue that the allocation of land to the East of Hemel Hempstead is not a reasonable alternative, focusing particularly on switching Policy H4 'on and off'

At Regulation 18 stage, HGC was assessed a variable (either wholly 'on' or wholly 'off') in the assessment of spatial strategy alternatives. At Regulation 19 stage HGC was always assessed as 'wholly on' in the assessment of spatial strategy alternatives.

We do not assess that this is a rational or justified to adopt an all or nothing approach.

The evaluation of a rational spatial strategy alternative, involving the partial 'swapping out' of Policy Area H4 within HGC for alternative strategic locations (at the other higher order settlement of St Albans) should have formed part of the SA process. This concerns duly identifying and testing the distribution of growth between Hemel Hempstead and St Albans.

There is no evidence before the examination that HGC 'fails' on viability of deliverability grounds without Policy area H4 being developed for 2,400 homes, or that the other HGC policy areas, if delivered without Policy H4, are not capable of delivering sustainable development on their own.

Part of the rationale for assessing a spatial strategy alternative without this location is that it is less well connected to rail infrastructure than the two preeminent, unallocated, strategic locations at St Albans. The NPPF advises that when making amendments to the Green Belt first consideration be given to sustainable patterns of development. The main train station at St Albans is central (and

accessible around the compass). Hemel Hempstead's stations is to the southwest of that settlement, whereas HGC lies to the East, next to J8 of the M1.

Q5 How does the SA take into account deliverability, especially around larger, strategic sites when assessing the submitted Plan against reasonable alternatives?

There is no evidence before the examination that HGC 'fails' on viability of deliverability grounds without Policy area H4 being developed for 2,400 homes. It is not a strong defence to claim an 'all or nothing' approach to HGC within the SA process.

Q6 How were reasonable alternative site options defined and considered as part of the SA process? Does the SA adequately test a suitable range of reasonable alternatives to the sites allocated in the Plan, including for housing and employment sites?

No. The focus must be on testing a suitable range of reasonable alternative spatial strategies (packages of sites/different futures for settlement) as opposed to 'sites' of themselves. Many alternative sites have been considered in the SA and the settlement specific sections of the SA apply a useful sequential assessment to the options at each settlement. The fault with the SA coverage of alternatives is the decision not to generate at least one alternative inter-settlement spatial strategy option, with the higher order settlement of St Albans delivering homes as an alternative to 2,400 homes within Policy H4 at Hemel Hempstead.