

Redbourn Parish Council
Matter 2 – Housing Growth and Spatial Strategy

ISSUE 1 – Local Housing Need

Housing

Q1. What is the plan period for the submitted St Albans Local Plan? Is this sufficiently clear to users of the Plan?

RPC Response:

1. The plan period appears to be 2021/22 – 2040/41 based on the Housing Trajectory (Table 3.2 of the Local Plan) however Strategic Policy SP1 (A Spatial Strategy for St Albans) refers to 1 October 2024-31 March 2041. It is therefore unclear and should be clearly stated in the Local Plan.

Q2. What is the minimum number of new homes needed over the whole plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the PPG?

RPC Response:

2. The Local Plan refers to a figure of 14,603 net additional dwellings.

Q3. Do any of these circumstances apply to St Albans?

RPC Response:

3. As set out in our responses to Matter 1, the Local Plan is not currently clear on whether it is taking on unmet housing needs from other local authorities therefore it is not possible to determine if circumstances for a higher housing need exist or not.

ISSUE 2 – The Housing Requirement

Q1. What is the justification for a) the level of housing proposed in the first 5 years post adoption, and b) the significant uplift from 485 to 1,255 dwellings per annum thereafter? Are the figures justified?

RPC Response:

1. There is no real justification for the proposed stepped housing trajectory or for the jump in housing delivery after the first five years of the Plan. The only mention of the stepped trajectory is in Paragraph 3.27 which states:

The housing trajectory has been stepped in order to allow sufficient time for the significant uplift in housing delivery to be realistically delivered.

2. There appears to be little to no analysis behind this statement. One would have hoped and expected that the trajectory was aligned with the Infrastructure Delivery Plan (and Schedule) in terms of the phasing of housing development and infrastructure requirements however this does not appear to be the case. As our representations set out in detail, the infrastructure and viability evidence have so many gaps that this probably is not even possible for SACDC to rely on that evidence to inform or justify its housing trajectory.

Q2. In response to the Inspectors' Initial Questions, the Council suggests that Policy SP3 should be modified to include a stepped requirement. Is this necessary for soundness, and if so, what should the housing requirement be?

RPC Response:

3. As explained above, it is unclear why a stepped requirement is proposed in the first place

Q3. Is the housing requirement intended to be found in Policy SP1 or SP3?

RPC Response:

4. The housing need and requirement figure are currently, and confusingly, located in Policy SP3 which deals with 'Land and the Green Belt'. These figures should be set out clearly in Policy SP1 instead.

ISSUE 3 – Settlement Hierarchy

- Q1. What is the justification for this approach given the period of time which has elapsed? Does the assessment adequately reflect the form, role and function of existing settlements in the area?**

RPC Response:

1. Clearly the existing form, role and function of each settlement should be based on the development that has occurred since 1994. It would appear that the Settlement Hierarchy Study Part 1 Baseline (LPCD 13.01) is based on outdated assumptions about the settlements in the District and needs to be updated to reflect the current situation.

- Q2. Are the scores used in the settlement hierarchy assessment accurate and robust?**

RPC Response:

2. As we have set out in great detail in our representations the Services and Facilities Audit (Appendix 5 of the Settlement Hierarchy Study) looks very basically at 'higher order services' and 'key services'. We are concerned that this assessment is also flawed and misses several services and facilities normally found in settlements that have not been accounted for, such as village halls, libraries, nurseries, public houses, places of worship, outdoor leisure facilities, hospitals, etc. Unfortunately, the study only refers to the following incomplete list of services and facilities:
 - High order services: secondary school, supermarket, leisure centre.
 - Key services: primary school, playground, convenience food shop, GP surgery
3. Furthermore, the approach to transport and accessibility scores in the Settlement Hierarchy Study scores equivalently different transport options. For example, the presence of five cycle routes within/between settlements is equivalent to the presence of a main line railway station. Clearly, these two cannot be compared and scored equally in principle, as railway services provide transportation services normally to nearby settlements, London and the rest of the country. On the other side, cycle infrastructure is limited as a transport option insofar as medium and large distances cannot be reasonable travelled by bicycle. Cycling is also not a feasible option for many people in the district due to disabilities, age, health, safety, etc.

4. The above provide a few examples (and not the full extent) of why the Study uses a flawed methodology and does not lead to an accurate or robust assessment.

Q3. How have the scores and baseline evidence been used to determine which settlements fall within the proposed tiers? Is the settlement hierarchy justified, effective and sound?

RPC Response:

5. Our representations go into considerable detail on the disconnect between the scores and baseline evidence and the proposed tiers which demonstrate that the evidence, proposed settlement hierarchy and proposed housing distribution are inherently flawed and cannot be relied upon.
6. For the settlement of Redbourn, it is proposed as a Tier 4 (Large Village) settlement and shares this tier with Wheathampstead. This is a change from the current policy in the Adopted Local Plan (1994) which has has Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street / Frogmore, Redbourn and Wheathampstead designated as 'Large Villages'.
7. There is no explanation in the Draft Local Plan for why there is such a fundamental proposed change to the Settlement Hierarchy in terms of Redbourn and Wheathampstead remaining as Large Villages and the other settlements being downgraded.
8. Considering that How Wood and Chiswell Green were previously classified as 'Large Villages' individually there has clearly been merit in this designation. The Settlement Hierarchy (2023) gives an overall score for Chiswell Green as 9.3 and How Wood 7.4. The two settlements are functionally one settlement with a combined population of 7,557 which is greater than Redbourn (5,098). These settlements have access to a railway station whereas Redbourn is solely reliant on a bus service. We consider that How Wood and Chiswell Green should be considered as one settlement in the settlement hierarchy and at least Tier 4 as a 'Large Village'.

ISSUE 4 – Distribution of Housing Growth

Q1. How does the distribution of housing growth compare with the settlement hierarchy over the plan period, taking into account completions, commitments and sites identified in the Local Plan? Does the spatial strategy reflect the size, role and function of settlements in Policy SP1?

RPC Response:

1. The Draft Local Plan does not set out the overall housing planned by settlement, so we have taken the initiative to undertake this exercise in our representations to better understand how SACDC is proposing to distribute housing, with special interest in Redbourn. We have based our calculations on Part B of the Local Plan (Local Plan Sites) and the development assumptions set out in Table 3.1 of the Draft Local Plan.
2. Redbourn is clearly an anomaly as the proposed location of a disproportionate amount of housing for its place in the Settlement Hierarchy as a Tier 4 (Large Village). Furthermore, Redbourn is allocated significantly more residential development than London Colney, which sits higher in the Settlement Hierarchy.
3. We note that Policy SP1 states that "The City of St Albans will continue to be the pre-eminent focus in the District for housing, employment, services, retail, the evening economy, education and healthcare". However, according to our calculations the City of St Albans is not the pre-eminent focus of this Plan by a considerable margin; it is Hemel Hempstead that is the focus as the proposed location for 45% of the Draft Local Plan's housing growth (on broad locations and allocations). In contrast St Albans is the proposed location for 24% of the housing growth.

Q2. What is the justification for referring to sites over 250 dwellings as 'broad locations' when they are identified in Part B of the Plan? Is this approach sufficiently clear to users of the Plan and is it effective?

RPC Response:

4. This is very unclear as to whether they are broad locations or site allocations and should be clarified in the Plan.

Q3. How does the distribution of sites by size reflect the settlement hierarchy? For example, are all the 'broad locations' within Tiers 1-3?

RPC Response:

5. This is also unclear and will need to be answered by SACDC.

Q4. Has the Council identified land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, as required by paragraph 70 of the Framework?

RPC Response:

6. Paragraph 3.6 of the Local Plan states that:

“Small and medium sized sites can also make an important contribution to meeting need and are often quicker to build out, and the Local Plan should identify land to accommodate at least 10% of housing requirement on sites no larger than one hectare”

7. However, the plan does not actually identify land to accommodate at least 10% of the housing requirements on sites no larger than one hectare. The Housing Trajectory includes a category of ‘Medium and Small Sites (5-99 Homes)’ which includes 851 dwellings.

8. It is unclear what sites these are and whether or not they are no larger than 1 hectare.

9. Even if one were to assume that all of these sites were no larger than 1 hectare, 851 dwellings is still only 5.8% of the housing requirement (14,603).

ISSUE 5 – Site Selection Methodology

Q1. What were the reasons for discounting sites at the initial assessment stage? Was this done on a consistent and transparent basis?

RPC Response:

1. The reference to the HELAA identifying that 566 out of 678 sites identified for potential residential use would progress to the Site Selection process, and as a result 112 sites being discounted at the initial stage, is under the subheading ‘Potential Sites on Green Belt Locations’. Therefore, one could infer that the reason for the sites being discounted is due to Green Belt reasons however it is not clear how this was actually undertaken.

Q2. Were all sites beyond the ‘buffers’ discounted at this stage? Is this a justified and effective approach to site selection?

RPC Response:

2. SACDC will need to confirm this either way. However, this is clearly not a justified and effective approach to simply draw a circle around a settlement using an arbitrary 'buffer' distance which is unlikely to relate to the sustainability or suitability of a any given location in the District.

Q3. What was the justification for using distances when determining accessibility? How were other factors taken into account such as the ability to access services and facilities by walking, cycling and public transport?

RPC Response:

3. The accessibility scoring is clearly inflated for Redbourn. The sub-areas studied are located on the edge of the settlement, adjacent to 20th century suburban areas with no or very limited access to public transport, where walking distances are exacerbated by a convoluted suburban layout of cul-de-sacs and long residential roads, of difficult access to the town centre, facilities, employment and public transport. Therefore, RPC considers that the 'Strong' scoring in the accessibility section is unjustified.

Q4. As part of this process, how did the Council consider the necessary infrastructure requirements of proposed sites, such as the need for highway improvement works or new and improved services, such as education and health?

RPC Response:

4. This does not appear to have been taken account of and the IDP / IDS has so many gaps that it SACDC may not be aware of the necessary infrastructure requirements for each settlement or potential sites at each settlement.

Q5. How did the Council consider the viability and deliverability of sites, especially where new or upgraded strategic infrastructure is required?

RPC Response:

5. Viability does not appear to have been considered as part of this process based on the information made available by SACDC.

Q6. What was the justification for this approach, and why did it differ from potentially sustainable development proposals in other Tiers of the hierarchy?

RPC Response:

6. This is a question only SACDC can answer as it is not transparent why a different approach was taken for various settlements which lacks consistently in approach across the District.

Q7. Following the completion of the proformas, how did the Council decide which sites to allocate?

RPC Response:

7. It is entirely unclear as to the decision-making process for selecting the sites to allocate in the Local Plan. SACDC states in the Methodology Paper that *“The decision-making process is set out in Table 1 below”*. However, this Table does not explain how sites were selected for proposed allocation in the Local Plan – it is simply a table of the ‘site assessment criterion’. Even as a table of the ‘site assessment criterion’ it is overly complex and not clear how sites were actually assessed.

Q8. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

RPC Response:

8. As set out above the site selection process is not robust and the method for selecting potential sites is flawed. An example of a site that was selected where the methodology used was flawed is the ‘Site Selection Proforma Sheet C-096 (West of Redbourn)’. This states that the site is located within the “Green Belt Study less important area”, but according to the GBR and the methodology accompanying the site selection, the site, as per the red line shown in the proforma is ‘partly within less important area’ and partly within an important area. This should be corrected, and justification should be provided to understand the rationale for the changes from the HELAA boundary site to the allocation boundary site.
9. Furthermore, whilst the resulting allocation remains outside of the ‘important area’, no qualitative assessment has been carried out of the implications of the allocation being brought forward up to the boundary of the ‘important area’. How is any future development going to affect the Green Belt in this important location?