Matter 2 – Housing Growth and Spatial Strategy

Issue 4 – Distribution of Housing Growth

18.   Policy SP1 states that the Settlement Hierarchy provides the basis for the allocation and location of growth, locating most growth generally within and adjacent to the larger and most sustainable urban centres in Tiers 1-3 (St Albans and Hemel Hempstead, Harpenden and London Colney).

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?

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?

1.1   There is a very strong (though not exact) correlation between the distribution of housing growth compared with the settlement hierarchy over the plan period, taking into account completions, commitments and sites identified in the Local Plan. The housing growth including planning permissions not completed[1] as of 1 October 2024, allocations from the Harpenden Neighbourhood Plan, allocations in the draft St Albans Local Plan, and expected windfall development is distributed across the settlement hierarchy as set out in the tables below:

Table 1: Total number and percentage of homes by settlement

Settlement	Tier	Total homes (net) (2024/25-2040/41) [2]	% of total homes (net) (2024/25 – 2040/41)
St Albans	1	4,652	*31%*
Hemel Hempstead	1	4,447	*30%*
Harpenden	2	2,198	*15%*
London Colney	3	563	*4%*
Radlett[3]	3	274	*2%*

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[1] On average 8% of planning permissions lapse without being implemented or superseded. As it is not possible to determine which planning permissions will lapse the total units in each planning permission has been reduced by 8% to ensure that the total units from planning permissions are in the line with the draft Plan's housing trajectory.

[2] Due to rounding errors in the modelling behind the total homes by place, the total number of homes in this column is 14,988, rather than the 14,989 that is planned for in the draft Local Plan. The total number of homes planned for in the district from 1 October 2024 to 31 March 2041 remains 14,989 homes.

[3] The draft Local Plan does not say which tier would apply to Radlett. However, as Site B8 forms an extension to Radlett the tier has been calculated using the methodology in the St Albans City and District Council Settlement Hierarchy Study Part 1 Baseline (LPCD 13.01). The calculation is as follows:

Criteria	Result	Score
Population	8,200 (source: paragraph 6.4 of St Albans City and District Council Settlement Hierarchy Study Part 2 Baseline (LPCD 13.02)	0.8
Cycle Route Score	One internal leisure route, and one cyclable ROW heading west from the settlement	1

Settlement	Tier	Total homes (net) (2024/25-2040/41) [2]	*% of total homes (net) (2024/25 – 2040/41)*
Redbourn	4	663	*4%*
Wheathampstead	4	168	*1%*
Bricket Wood	5	196	*1%*
Chiswell Green	5	139	*1%*
How Wood	5	421	*3%*
Park Street and Frogmore	5	138	*1%*
Green Belt Villages combined	6	33	*<1%*
Green Belt Hamlets combined	7	1	*<1%*
Within Green Belt		1,096	7%

Table 2: Total number and percentage of homes by Tier of settlement

Tier	Total homes (net) (2024/25-2040/41)	% of total homes (net) (2024/25 – 2040/41)
1	9,099	61%
2	2,198	15%
3	837	6%
4	831	6%
5	894	6%
6	33	*<1%*
7	1	*<1%*
Within Green Belt	1,096	7%

<u>Does the spatial strategy reflect the size, role and function of settlements in Policy SP1?</u>

1.2   Yes, the spatial strategy reflects the size, role and function of settlements in Policy SP1. This is illustrated by the fact that:

- 61% of the housing growth will be in Tier 1 locations.
- 76% of housing growth will be in Tier 1 and Tier 2 locations those being the locations with the greatest concentration of services and access to employment.
- Each of the Tier 3 and 4 settlements, with key services to support day-to-day living, employment, and access to higher order settlements by public transport or cycling, have between 1% and 4% of overall housing growth each

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Bus routes	338 and 601 run at least hourly Monday to Saturday. The 602 runs at least hourly Monday to Sundays.	3
Train access scores	Mainline train station	8
Services and facilities score	No higher order services. All four key services.	5
Employment audit score	No employment sites allocated in Hertsmere's development plan	0
Total	Total score is same as for London Colney (a Tier 3 settlement)	**17.8**

- The Tier 5 settlement, with key services to support day-to-day living, and access to higher order settlements by public transport or cycling have between 1% and 3% of overall housing growth each.
- Between them the Tier 6 settlements contain less than 1% of the overall housing growth in the Plan Period, reflecting their smaller size and status as settlements with some services and reasonable access to higher order settlements by public transport or cycling.
- Overall at least 86% of housing growth will be in Tiers 1, 2 ,3 or 4. Only 6% of housing growth will be in Tiers 5, 6 or 7.

1.3   All of the unconsented allocated employment growth is also in Tier 1 or Tier 2 locations on sites H3 (Hemel Hempstead), and OS3 and OS4 (both in Harpenden).

19. Policy SP1 also states that broad locations are defined as sites of over 250 dwellings or strategic scale employment sites.

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?

<u>What is the justification for referring to sites over 250 dwellings as 'broad locations' when they are identified in Part B of the Plan?</u>

2.1 The justification for referring to sites over 250 dwellings as 'broad locations' stems directly from the wording in the NPPF at paragraph 69:

Identifying land for homes

69. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for five years following the intended date of adoption[35]; and
b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

<u>Is this approach sufficiently clear to users of the Plan and is it effective?</u>

2.2 The Council considers that the approach is sufficiently clear to users of the Plan and is effective, but recognises that an alternative approach could be taken. The Council is open to an alternative approach that terms the 'Broad Locations' as 'Strategic Sites' or similar, throughout 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?

3.1 There is a very strong (though not exact) correlation between the distribution of sites by size and the settlement hierarchy. The sites are distributed by size, settlement and tier as set out in the tables below. The tables include planning permissions not completed[4] as of 1 October 2024, allocations from the Harpenden Neighbourhood Plan, and allocations in the draft St Albans Local Plan. Eleven of the twelve allocated 'Broad Locations' (sites with more than 250 homes) lie within Tiers 1 to 3, and the other 'Broad Location' is in a Tier 4 settlement.

Table 3: Total number of homes by settlement and site size

Settlement	Tier	Broad Locations (250+ homes)	Large Sites (100-249 homes)	Medium sites (10-99 homes)	Small sites (5-9 homes)	Modelled windfall develop-ment
St Albans	1	1,904	236	1,010	291	1,210
Hemel Hempstead	1	4,300	147	-	-	-
Harpenden	2	1,031	-	544	137	487
London Colney	3	324	-	124	30	84
Radlett	3	274	-	-	-	-
Redbourn	4	544	-	68	10	41
Wheathampstead	4	-	-	145	7	16
Bricket Wood	5	-	-	118	31	46
Chiswell Green	5	-	101	20	1	17
How Wood	5	-	294	79	4	45
Park Street and Frogmore	5	-	104	11	7	16
Green Belt Villages combined	6	-	-	90	10	22
Green Belt Hamlets combined	7	-	-	-	-	1
Within Green Belt		663 [5]	-	221	96	116

Table 4: Total number of homes by Tier of settlement, and site size

Tier	Broad Locations (250+ homes)	Large Sites (100-249 homes)	Medium sites (10-99 homes)	Small sites (5-9 homes)	Modelled windfall development
1	6,204	384	1,010	291	1,210
2	1,031	-	544	137	487
3	598	-	124	30	84

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[4] On average 8% of planning permissions lapse without being implemented or superseded. As it is not possible to determine which planning permissions will lapse the total units in each planning permission has been reduced by 8% to ensure that the total units from planning permissions are in the line with the draft Plan's housing trajectory.
[5] All the of the 663 units on sites of 250 or more homes in the Green Belt are on sites that already have planning permission, and not allocations in the draft Local Plan.

4	544	-	213	17	57
5	-	499	228	43	124
6	-	-	90	10	22
7	-	-	-	-	1
Within Green Belt	663 [6]	-	221	96	116

Table 5: Percentage of homes by Tier of settlement, and site size

Tier	Broad Locations (250+ homes)	Large Sites (100-249 homes)	Medium sites (10-99 homes)	Small sites (5-9 homes)	Modelled windfall development
1	41%	3%	6%	2%	8%
2	7%	-	4%	1%	3%
3	4%	-	1%	<1%	1%
4	4%	-	1%	<1%	<1%
5	-	3%	2%	<1%	1%
6	-	-	1%	<1%	<1%
7	-	-	-	-	0%
Within Green Belt	4% [7]	-	1%	1%	1%

Table 6: Number of sites by settlement and site size

Settlement	Tier	Broad Locations (250+ homes)	Large Sites (100-249 homes)	Medium sites (10-99 homes)	Small sites (5-9 homes)
St Albans	1	3	2	34	115
Hemel Hempstead	1	3	1	-	-
Harpenden	2	2	-	17	68
London Colney	3	1	-	5	13
Radlett	3	1	-	-	-
Redbourn	4	1	-	1	6
Wheathampstead	4	-	-	2	7
Bricket Wood	5	-	-	2	14
Chiswell Green	5	-	1	2	1
How Wood	5	-	2	2	2
Park Street and Frogmore	5	-	1	1	3
Green Belt Villages combined	6	-	-	-	8
Green Belt Hamlets combined	7	-	-	-	-
Within Green Belt		2	-	5	43

[6] Ibid
[7] Ibid

Table 7: Number of sites by Tier of settlement, and site size

Tier	Broad Locations (250+ homes)	Large Sites (100-249 homes)	Medium sites (10-99 homes)	Small sites (5-9 homes)
1	6	3	34	115
2	2	-	17	68
3	2	-	5	13
4	1	-	3	13
5	-	4	7	20
6	-	-	-	8
7	-	-	-	-
Within Green Belt	2	-	5	43

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?

4.1   Yes, the Council has identified land to accommodate at least 10% of its housing requirement on sites no larger than 1 hectare, as required by paragraph 70 of the Framework. The Plan's housing trajectory meets national policy requirements in the NPPF December 2023 to identify small and medium sized sites through the Development Plan. Paragraph 70 of the NPPF December 2023 states:

70. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved…

4.2   The submitted Local Plan has met this requirement to identify small and medium sized sites. The housing trajectory identifies land to accommodate at least 10% (1,460 net dwellings) of the total housing requirement of 14,603 net dwellings (in the period 1 October 2024 to 31 March 2041) on sites no larger than one hectare. Specifically, 1,023 net dwellings (7% of the total housing requirement) are estimated to be delivered from planning permissions (estimated future completions with a -8% lapse assumption) on small and medium sites (1 hectare and below) between 2024/25 and 2040/41.

4.3   In addition, 787 net dwellings (5.4% of the total housing requirement) are estimated to be delivered from the Part B site allocations on small and medium sites (1 hectare and below) between 2024/25 and 2040/41. Furthermore, 23 net dwellings (0.2% of the total housing requirement) are estimated to be delivered from the remaining made Harpenden Neighbourhood Plan 2018 housing site allocations on small and medium sites (1 hectare and below) between 2024/25 and 2040/41. The estimated total delivery of 1,833 net dwellings from permissions and site allocations in the submitted Local Plan and made Harpenden Neighbourhood Plan on small and medium sites (1 hectare and below) between 2024/25 and 2040/41 represents 12.6% of the total housing requirement.

4.4   Moreover, additional housing on small and medium sites of 1 hectare and below will be delivered as part of the annual windfall allowance over the plan period. Overall, over the past 10 years (2013/14 to 2022/23), 64% of the homes on sites that form the basis of the calculation of the annual windfall allowance, were on sites of 1 hectare or below. This means that 1,349 net dwellings (9.2% of the total housing requirement) are estimated to be delivered from windfall on small and medium sites (1 hectare and below) between 2024/25 and 2040/41. Overall, the estimated total delivery of 3,182 net dwellings from permissions, draft Local Plan and made Harpenden Neighbourhood Plan site allocations, and windfall on small and medium

sites (1 hectare and below) between 2024/25 and 2040/41 represents 21.8% of the total housing requirement. Data summarising estimated housing delivery from small and medium sites in the submitted Plan housing trajectory can be seen in Table 9 below:

Table 8: Submitted Local Plan housing trajectory – small and medium sites (1ha and below 1ha), net number of dwellings (2024/25 - 2040/41)

Source	Small and medium sites (1ha and below 1ha), net number of dwellings (2024/25 - 2040/41)	Percentage of Total Draft Local Plan 2041 Housing Requirement (14,603 net dwellings) (1 October 2024 to 31 March 2041)
Part B - Local Plan Site Allocations	787	5.4%
Harpenden NP Site Allocations	23	0.2%
Permissions (Estimated Future Completions)	1,112	7.6%
Permissions (Estimated Future Completions) -8% Lapse Assumption	-89	-0.6%
Windfall Allowance	1,349	9.2%
Total	**3,182**	**21.8%**
Difference (+/-) from 10% small and medium sites requirement (1,460 net dwellings)	*+1,722*	*+11.8%*

4.5   Further details of the individual small and medium sites (1 hectare and below) for the Local Plan Part B site allocations, made Harpenden Neighbourhood Plan site allocations and permissions (estimated future completions) in Table 8 above are included in M2 I4 Q4 Appendix 1 – Small and Medium Housing Sites.

Q5 How did the classification of land as Green Belt and the availability of land within the urban area determine the spatial strategy and distribution of housing growth?

5.1   The Council followed the Government's policy as set out in the NPPF in prioritising land within the urban area first. This priority is set out in the NPPF in Chapter 11 "Making effective use of land" at paragraph 123:

Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

5.2   This is reflected in the Plan in Chapter 1 "A Spatial Strategy for St Albans City and District" at paragraph 1.32, 3.2, 3.12 and 3.13:

1.32 The Council is taking the approach of identifying and prioritising development sites on Previously Developed Land / Brownfield land first.

3.2 This Plan is taking the approach of identifying and allocating Previously Developed Land / Brownfield sites first for development so that growth is as sustainable as possible.

3.12 The Local Plan seeks to make the most efficient use of land in the District and has undertaken an extensive and rigorous search for Previously Developed Land (PDL) (also known as 'Brownfield land' in national policy) within existing built-up areas. The approach has been underlain by the concept of 'leaving no stone unturned' in the search for appropriate sites on brownfield land.

3.13 This extensive search has also included potential PDL opportunities in the Green Belt.

5.3   The Council also followed the Government's policy as set out in the NPPF in achieving appropriate densities and making efficient use of land. This priority is set out in the NPPF in Chapter 12 "Achieving appropriate densities" at paragraph 128:

Planning policies and decisions should support development that makes efficient use of land…

5.4   This is reflected in the Plan in Chapter 1 "A Spatial Strategy for St Albans City and District" at paragraph 1.34; and also in LG1 Broad Locations; LG2 – Large, Medium and Small Sites and most directly in paragraphs 12.13-1.15 and DES3 – Efficient Use of Land:

1.34 Development should make efficient use of land by increasing the density and potentially the height of development, where appropriate. This will be encouraged, particularly in the most accessible parts of the main urban settlements.

LG1 – Broad Locations
…Make efficient and effective use of the site, with a minimum overall net density of 40 dwellings per hectare; utilising a range of densities that take account of adjacent character, uses and identity;

LG4 – Large, Medium and Small sites
Make effective use of the site, with a minimum overall net density of 40 dwellings per hectare, taking account of adjacent character, uses and identity;

12.13 National policy sets out that planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. The Council's approach is to encourage higher density development within the District's more sustainable and accessible areas, and to require that new development makes efficient use of land. This approach assists in meeting development needs within settlements and in reducing the pressure on the Green Belt. Furthermore, concentrating development in locations with more options for active travel and public transport is in line with the aims of national policy and supports the Council's Sustainability and Climate Crisis Strategy. In addition, there can be sustainability benefits from higher density development, both in terms of the embodied carbon and the operational greenhouse gas / energy costs to use the buildings.

12.14 Higher densities can often be achieved without increasing building heights, through consideration of design, layout, building type and housing mix. For example, density may be increased through incorporation of suitably designed flats, maisonettes or cluster houses. Careful analysis and consideration of the site's context and constraints should be undertaken to ensure denser development does not detract from the character of an area. The optimum density for a particular development will be influenced by the site-specific factors and constraints.

12.15 There are many ways in which density can be measured but the simplest and most common way is dwellings per hectare (dph); with net dph representing the density of the developable area only, excluding land for infrastructure, open space, main roads, schools and community facilities. In accordance with previous Council density studies, current best practice and the need to make efficient use of land; it is considered that 40 net dph is a minimum density that can generally be readily achieved throughout the District. Furthermore, in existing higher-density areas, new development should not fall below the density of the site context, which would be determined on a site by site basis.

DES3 – Efficient Use of Land Development proposals should make efficient use of land. Development should:

a) Where additional residential units are proposed, achieve at least the density of the existing site context or 40 net dwellings per hectare, whichever is higher; and
b) Optimise site capacity within city and town centres and other locations that are well served by public transport. This requires development to be of the most appropriate form and land use for the site, having regard to site context and constraints. Development proposals that do not make efficient use of land will be refused.

5.5 The Council also followed the Government's policy as set out in the NPPF in seeking to protect Green Belt land. This priority is set out in the NPPF in Chapter 13 "Protecting Gren Belt land" at paragraph 146:

145. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;
b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

5.6 (a) is reflected in the Plan as already set out above.
(b) is also reflected in the Plan as already set out above.
(c) is reflected in the evidence set out in LPCD 06.01 Duty to Cooperate Statement of Compliance.

5.7 This is also reflected in the Plan at paragraph 3.19:

National policy sets out that before concluding that 'exceptional circumstances' exist to justify changes to Green Belt boundaries, the Council should demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This means that the Council's strategy must (and the Council has):

a) Make as much use as possible of suitable PDL sites and underutilised land;

b) Optimise the density of development in line with national policy, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

5.8   The Council also followed the Government's policy as set out in the NPPF in seeking to promote sustainable patterns of development. This priority is set out in the NPPF in Chapter 13 "Protecting Gren Belt land" at paragraph 147:

147. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. 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. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

5.9   This is primarily reflected in the Plan as already set out above. The aspect of compensatory improvements to the environmental quality and accessibility of remaining Green Belt land is primarily addressed in the Plan at paragraph 3.58 and LG6 – Green Belt Compensatory Improvements:

3.58 Where it is concluded that loss of Green Belt land for development is necessary, national policy sets out that compensatory improvements to the environmental quality and accessibility of remaining Green Belt land are expected.

LG6 – Green Belt Compensatory Improvements The allocations in Part B that are facilitated by Green Belt boundaries changed by this Plan are required, to a degree proportionate to the development, to:
a) Submit a Green Belt compensation strategy that sets out compensatory measures that align with national planning guidance, relating to:
i. New or enhanced green infrastructure;
ii. Woodland planting;
iii. Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
iv. Improvements to biodiversity, habitat connectivity and natural capital;
v. New or enhanced walking cycling or equestrian routes; or
vi. Improved access to new, enhanced or existing recreational and playing field provision.
b) Retain existing hedgerows and trees and other areas of biodiversity value such as ponds;
c) Enhance existing green and blue infrastructure links within their sites, and connect any fragmented links, to provide biodiversity (also known as wildlife corridors). Development must also take account of green and blue infrastructure links beyond

their sites and try to integrate their designs with them and not create severance through poor design;

d) Maintain any Rights of Way across / through the site, ensuring provision of a route that is safe and overlooked, is sufficient in width to easily allow the passing of two people, and is carefully designed to become a positive landscape feature. Should a diversion to any Rights of Way be unavoidable, replacement routes must be provided to the satisfaction of the Council and the relevant highway authority;

e) Ensure access to adjacent Rights of Way are facilitated in a safe and direct manner and maintain linkages that provide for appropriate utility and recreational use, and ensure that improvements are enabled so as to mitigate for the increased user impact of the development on the fabric of the network, including through good design;

f) Provide woodland buffer planting when adjacent to established urban areas overlooking what was once open countryside. NB: Where a development is required to submit both a Green Belt compensation strategy and provide Suitable Alternative Natural Greenspace (SANG), the Green Belt compensation strategy can incorporate features that are proposed within the SANG, in accordance with this policy.