

## Matter 2 – Housing Growth and Spatial Strategy

### Issue 5 – Site Selection Methodology

20. The Local Plan Site Selection – Proforma Methodology Paper (September 2024) (LPSS 02.02) describes the process used by the Council to allocate sites in the Plan. The starting point is the Housing and Economic Land Availability Assessment ('HELAA'). The Methodology Paper states that out of 678 housing sites, the HELAA identified 566 sites to progress to the next stage.

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

- 1.1 Yes, the discounting of sites at the initial assessment stage of the process – the Housing and Economic Land Availability Assessment – was carried out on a consistent and transparent basis.
- 1.2 The Local Plan Site Selection – Proforma Methodology Paper (September 2024) (LPSS 02.02) paragraph 1.6 states that:

*Sites which were not considered to be suitable, available or achievable by the HELAA were excluded from further consideration at this stage as part of the Site Selection process. The HELAA identified that 566 out of 678 sites identified for potential residential use would progress to the next stage of the Site Selection process.*

- 1.3 This paragraph is referencing the Housing and Economic Land Availability Assessment HELAA 2021 (Examination document HELAA 01.01), in particular paragraph 4.12 which states that:

*A total of 112 sites were not taken forward to site selection (33 sites from the HELAA were not taken forward to site selection and 79 sites from the Urban Capacity Study were not taken forward to site selection). These sites were excluded from being taken forward to the Site Selection process due to either being unsuitable, unachievable, or unavailable.*

- 1.4 This paragraph is therefore making clear that 33 sites from the Call for Sites and HELAA process were not taken forward, with the other 79 sites being part of the Urban Capacity Study process. The document sets out the reasons for the HELAA process sites not being progressed (Table 5) which can be summarised as follows:
- The site has not been put forward by landowner, agent or developer.
  - The site is of insufficient size to provide a capacity for five or more dwellings.
  - A majority of the site located within Flood Zone 3B and there is no realistic prospect of development outside this constraint.
  - The site is located entirely within a Registered Park and Garden.

1.5 The reasons for not progressing 79 sites during the initial sift from the UCS is set out in the Urban Capacity Study (Examination document HELAA 03.02) as follows:

- Site in Flood Zone 3b
- Site is a Scheduled monument
- Site is Ancient Woodland
- Site is a Registered Park and Garden
- Site is a Local Nature Reserve
- Site is a SSSI
- Site is an Open Space
- Site is an educational site
- Site is in community uses
- Site is an allocated employment site.

21. The Methodology Paper (LPSS 02.02) then states that “a more spatially focussed piece of work” was carried out by applying a buffer around each settlement inset from the Green Belt to assist in “encouraging a sustainable pattern of development”. This use of buffers is addressed in the response to Question 2 below.

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

- 2.1 Yes, all sites beyond the buffers were discounted by the Stage 2 Green Belt Review (GB 02.02). The GBR Stage 2 makes clear that it was a part of SADCs site selection process, stating in section 4.2.1 that:

*... the GBR Stage 2 feeds directly into SACDC’s site selection process. It was therefore appropriate to undertake a more spatially focussed piece of work.*

- 2.2 The Stage 2 GBR then goes on to state further at 4.2.1 how the spatially focussed piece of work would be undertaken:

*The initial area of search was defined by applying a buffer around each settlement inset from the green belt ...*

- 2.3 The technique of using buffers is part of a justified and effective approach to site selection in that it would:

*assist in encouraging sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt. ... This approach ensured a proportionate and focussed study.*

- 2.4 This is explained further, setting out the exact reasons justifying the reasons for excluding sites beyond the buffers:

*Sites that were not adjacent to existing urban areas (or the buffers) were thus excluded for the assessment on the basis that their release would (a) not contribute to a sustainable pattern of development; and (b) undermine the integrity of the Green Belt by creating hole(s) within its fabric.*

- 2.5 The approach of using buffers in carrying out a Green Belt Review has been used for other local authorities, as stated in the Stage 2 GBR Section 1.3 Study Context:

*The methodology has also been informed by experience elsewhere including authorities where Local Plans (and underpinning evidence) have been found sound, such as Runnymede where the Green Belt evidence was commended by the Inspector*

- 2.6 The Stage 2 GBR Appendix A3 sets out some of the experience of other Green Belt Reviews, including the use of buffers, for other local authorities such as Runnymede Borough Council and Spelthorne Borough Council, where the approach has been accepted (and indeed commended) as part of the evidence for now adopted Plans.

22. Proformas were then used to analyse each site against a “sustainable development potential”, taking into account the Green Belt Study and major policy and environmental constraints. Accessibility was determined by measuring distances to key infrastructure and services.

**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?**

- 3.1 The Site Selection Proformas provide an assessment of distances to key infrastructure and services such as public transport, schools, employment, local facilities and GP surgeries. The analysis was undertaken to understand and assess a site's strengths, weaknesses and attributes that needed to be addressed through criteria set out in Local Plan policies and allocations. It should be noted that this was not undertaken as a scoring exercise. This is set out in the Site Selection Proforma Methodology (LPSS 02.02).
- 3.2 Transport Impact Assessments (TIA) (INF 09.01) were used to assess all sites considered for allocation. The TIAs were prepared collaboratively with Hertfordshire County Council. The TIAs approach to accessing services and facilities using active and sustainable modes of transport was not only distance based, but carefully considered factors such as the walking times and conditions for pedestrians, cycling and public transport. The response to Initial Questions, Question 9 - The Green Belt and Exceptional Circumstances – Evidence Paper (SADC/ED32), stated in paragraph 9.20:

*For Green Belt sites the Proforma assessment included distances to the nearest public transport, i.e. bus stop and railway station. In their role as the Local Highways Authority, Hertfordshire County Council (HCC) requested that a Transport Impact Assessment be prepared for each proposed site allocation (INF 09.01 - Transport Impact Assessment (TIA) Intro (2024) and INF 09.02 to INF 09.09). The TIA informed the Proforma assessments and the draft Local Plan by considering the impacts of development of sites in transport terms, and what mitigation (if any) is required. This considered whether sustainable transport modes can be taken up, given the type of development and its location; whether safe and suitable access to the site can be achieved for all users; and whether any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The Cross Lane, Harpenden site M1a from the Local Plan Regulation 18 draft was not progressed due to it not being demonstrated that safe and suitable access for all transport modes had a reasonable prospect of being provided within the Plan period. The TIAs for all other Green Belt sites showed that they related sufficiently well to public transport and that safe and suitable access for all transport modes had a reasonable prospect of being provided within the Plan period, to be allocated in the draft Regulation 19 Plan.*

**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?**

- 4.1 The necessary infrastructure to support the requirements of the proposed sites was fully taken into consideration during the site selection process.
- 4.2 The site selection process identified the infrastructure issues, needs and requirements through an iterative approach that drew on a wide range of evidence and advice.
- 4.3 The outcome of the infrastructure requirements work is in Part B Local Plan Sites (LPCD 02.02), which sets out the detailed requirements for each and every proposed site in the section 'Key development requirements'. As would be expected the largest sites – the Broad Locations – contain the most significant and detailed infrastructure requirements. This includes for primary and secondary schools, medical centres, new local centres, transport infrastructure, sports facilities, and green spaces.
- 4.4 Furthermore, the Draft Local Plan 2041 document (Part A) (LPCD 02.01) provides a summary of the infrastructure requirements for Broad Locations in Table 3.1. Policy LG1 sets out of the policy requirements for proposals within a Broad Location. Policy LG4 sets out of the policy requirements for proposals within large, medium and small sites.
- 4.5 Transport needs were carefully considered during the process of site selection. The Council worked very closely with Hertfordshire County Council (HCC) - which is the Highway and transport authority for Hertfordshire - to prepare Transport Impact Assessments (TIA) (INF 09.01) which were used to assess all sites considered for allocation and considered access to services and facilities using active and sustainable modes of transport. Further detail on the TIAs is provided in the response to M2, I5, Q3.
- 4.6 During the site selection process the Council worked closely and collaboratively with the education provider Hertfordshire County Council (HCC) to assess school requirements and locations. The report PP&C Local Plan Evidence Education Need and Provision (June 2024) (INF 11.01) provides the evidence that underpins the approach to education provision (principally early years, primary and secondary school provision) in the draft Local Plan. The requirements for education provision are set out in the site allocations in Part B, for example the Broad Location H1 - North Hemel Hempstead under *Key development requirements* states:

*12. A 3FE primary school, including Early Years provision, to serve the new community and appropriate contributions towards secondary school provision*

- 4.7 During the preparation of the Plan the Council fully consulted with the relevant healthcare bodies during preparation of the Plan, including the Hertfordshire and West Essex Integrated Care Board. The requirements for medical provision are set

out in the site allocations in Part B, for example the Broad Location H2 - East Hemel Hempstead (North) under *Key development requirements*:

*22. ... including a medical centre*

- 4.8 The need for suitable green spaces was assessed through the St Albans Open Space Study (2024) (Examination document LCRT 01.01). Requirements for sites were assessed and are set out in the Part B allocations Key development requirements. For example H4 - East Hemel Hempstead requires:

*7. A Significant Publicly Accessible Green Area providing facilities for new and existing communities and a permanent green buffer to the south-east.*

- 4.9 The need for sports facilities was assessed through the Playing Pitch & Outdoor Sport Strategy & Action Plan (2023) (Examination document LCRT 02.01). Requirements for sites were assessed and are set out in the Part B allocations Key development requirements. For example B1 - North St Albans requires:

*4. Replacement of the displaced playing fields. The replacement playing fields must be an equivalent or better playing field in terms of quantity and quality and delivered prior to commencement of any development on the existing playing field. Sport England will be a statutory consultee on any future planning application that would affect the playing field within this site allocation.*

*5. On-site outdoor sports provision to meet the additional needs generated by the development. An offsite facility may be acceptable where justified by evidence and subject to early delivery of the offsite provision prior to occupation of first home.*

- 4.10 To support the new Local Plan the Council prepared an Infrastructure Delivery Plan (IDP) (2024) (Examination document INF 01.01). As stated in section 1.1 of the IDP:

*The purpose of the IDP is to set out the infrastructure that will be required to deliver the planned housing and employment growth across SADC. The IDP draws upon the existing evidence base produced by SADC, Hertfordshire County Council (HCC), and infrastructure providers.*

- 4.11 The IDP is supported by the Infrastructure Schedule (INF 01.02), which is a schedule of planned projects across the District. Where possible the Schedule provides the cost, funding, phasing, location and delivery bodies of each infrastructure investment.

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

- 5.1 The Council has primarily considered the viability and deliverability of sites, especially where new or upgraded strategic infrastructure is required, through the BNP Paribas Viability Reports (INF 10.03 – 10.13). New or upgraded strategic infrastructure is principally being planned in conjunction with the development of strategic sites. The Strategic Site Viability Reports 2024 demonstrate that contributions towards strategic infrastructure have been included and that the strategic sites are viable and developable. Further details are set out below, with selected extracts from the Strategic Site Viability Reports.
- 5.2 It is also considered important to bear in mind that in this District, because of the very high end sales values, development is generally highly viable and can provide for new or upgraded strategic infrastructure.
- 5.3 East Hemel (North) Strategic Site Viability Report (2024) (INF 10.03)

**Table 3.2.14.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£17,719,763	1 x 3 FE Primary (assumes c. £17.20m per primary school equating to c. £3,222 per unit across the 3 x Hemel sites)
	£14,566,097	1 x 6-8 FE Secondary (assumes c. £48.50m per secondary school equating to c. £8,883 per unit across the 3 x Hemel sites)
Healthcare	£9,190,000	Based on ARUP Costings
Sports & Community	£4,071,272	Based on Arup Costings
Green infrastructure: Country Park/SANG	£630,480	Based on ARUP Costings
Local open/play Space/Green Infrastructure	£1,569,365	Based on ARUP Costings
Transport Infrastructure	£29,619,640	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £11,000 per home for transport requirements (e.g. Highways) £385,000 for mobility hub
<b>Total</b>	<b>£76,981,617</b>	-

*'5 Conclusions and Recommendations This testing demonstrates that the East Hemel Hempstead (North) strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.'*

## 5.4 East Hemel (South) Strategic Site Viability Report (2024) (INF 10.04)

**Table 3.2.14.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£29,532,938	1 x 2FE and 1 x 3 FE Primary
	£21,316,800	1 x 6-8 FE Secondary (assumes c. £48.50m per secondary school equating to c. £8,883 per unit across the 3 x Hemel sites)
Healthcare	£4,010,000	Based on ARUP Costings
Sports & Community	£6,407,771	Based on ARUP Costings
Green infrastructure: Open Space/SANG	£2,354,047	Based on ARUP Costings
Strategic Green Infrastructure	£912,040	Based on ARUP Costings
Transport Infrastructure	£43,167,400	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £11,000 per home for transport requirements (e.g. Highways) £385,000 for mobility hub
<b>Total</b>	<b>£109,689,636</b>	-

*'5 Conclusions and Recommendations This testing demonstrates that the East Hemel Hempstead (South) strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.'*

## 5.5 East St Albans Strategic Site Viability Report (2024) (INF 10.05)

**Table 3.2.12.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£5,575,736	1 x 2 FE Primary equating to £11,813 per unit
	£5,575,736	Secondary - £11,813 per unit
Healthcare	£870,000	Based on ARUP Costings
Sports & Community	£1,438,353	Based on Arup Costings
Green infrastructure: Country Park		To be confirmed
Local open/play Space/Green Infrastructure	£706,488	Based on ARUP Costings
Transport Infrastructure	£6,289,872	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £6,500 per home for transport requirements (e.g. Highways)
Oaklands College	£29,365,098	Assessed by ARUP at £51m, to be apportioned between the indicative scheme of 472 units and the existing planning permission of the college site of 348 units. Equates to £62,195 per unit.
<b>Total</b>	<b>£49,821,283</b>	-

*'5 Conclusions and Recommendations This testing demonstrates that the East St Albans strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.'*



## 5.6 Glinwell Strategic Site Viability Report (2024) (INF 10.06 )

**Table 3.2.10.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
<b>Education</b>	£5,717,492	Based on £11,813 per unit
<b>Healthcare</b>	£730,000	Based on ARUP Costings
<b>Sports &amp; Community</b>	£1,290,983	Based on Arup Costings
<b>Green infrastructure:</b>		
Local open/play Space/Green Infrastructure	£724,450	Based on ARUP Costings
<b>Transport Infrastructure</b>	£6,449,784	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit)  £6,500 per home for transport requirements (e.g. Highways)
<b>Total</b>	<b>£14,912,709</b>	-

### *5 Conclusions and Recommendations*

*This testing demonstrates that the Glinwell Strategic Site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning polices as set out in our LPVS.'*

## 5.7 Harper Lane Strategic Site Viability Report (2024) (INF 10.07)

**Table 3.2.10.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£3,236,762	Based on £11,813 per unit
Healthcare	£450,000	Based on ARUP Costings
Sports & Community	£781,313	Based on Arup Costings
<b>Green infrastructure:</b>		
Local open/play Space/Green Infrastructure	£410,122	Based on ARUP Costings
Transport Infrastructure	£3,651,324	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit)  £6,500 per home for transport requirements (e.g. Highways)
<b>Total</b>	<b>£8,529,521</b>	-

### *5 Conclusions and Recommendations*

*This testing demonstrates that the Harper Lane strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning polices as set out in our LPVS.*

## 5.8 North East Harpenden Strategic Site Viability Report (2024) (INF 10.08)

**Table 3.2.12,1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£8,717,994	Based on £11,813 per unit
Healthcare	£2,790,000	Based on ARUP Costings
Sports & Community	£2,148,680	Based on Arup Costings
Green infrastructure:		
Local open/play Space/Green Infrastructure	£1,104,636	Based on ARUP Costings
Transport Infrastructure	£9,834,588	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £6,500 per home for transport requirements (e.g. Highways)
<b>Total</b>	<b>£24,595,898</b>	-

*5 Conclusions and Recommendations This testing demonstrates that the North East Harpenden strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.*

## 5.9 North Hemel Hempstead Strategic Site Viability Report (2024) (INF 10.09)

**Table 3.2.14: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
<b>Education</b>	£17,719,763	1 x 3 FE Primary (assumes c. £17.20m per primary school equating to c. £3,222 per unit across the 3 x Hemel sites)
	£13,323,000	1 x 6-8 FE Secondary (assumes c. £48.50m per secondary school equating to c. £8,883 per unit across the 3 x Hemel sites)
<b>Healthcare</b>	£2,500,000	Based on ARUP Costings

Contribution description	Contribution	Comments on contribution
<b>Sports &amp; Community</b>	£4,071,272	Based on Arup Costings
<b>Green infrastructure:</b> Country Park/SANG	£5,846,500	Based on ARUP Costings
Local open/play Space/Green Infrastructure	£1,421,279	Based on ARUP Costings
<b>Transport Infrastructure</b>	£27,124,000	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £11,000 per home for transport requirements (e.g. Highways) £385,000 for mobility hub
<b>Total</b>	<b>£71,798,547</b>	-

*5 Conclusions and Recommendations This testing demonstrates that the North Hemel Hempstead strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS*

## 5.10 North St Albans Strategic Site Viability Report (2024) (INF 10.10)

**Table 3.2.14.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£11,813,175	1 x 2 FE Primary (Based on ARUP Costings)
	£12,958,861	Secondary based upon £11,813 per unit
Healthcare	£3,490,000	Based on ARUP Costings
Sports & Community	£2,940,474	Based on Arup Costings
Green infrastructure: Local open/play Space/Green Infrastructure	£1,641,987	Based on ARUP Costings
Transport Infrastructure	£14,618,622	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £6,500 per home for transport requirements (e.g. Highways)
<b>Total</b>	<b>£47,463,119</b>	-

*5 Conclusions and Recommendations This testing demonstrates that the North St Albans strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.*

## 5.11 North West Harpenden Strategic Site Viability Report (2024) (INF 10.11)

**Table 3.2.11.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£3,461,209	Based on £11,813 per unit
Healthcare	£490,000	Based on ARUP Costings
Sports & Community	£835,314	Based on Arup Costings
Green infrastructure: Local open/play Space/Green Infrastructure	£438,562	Based on ARUP Costings
Transport Infrastructure	£3,904,518	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £6,500 per home for transport requirements (e.g. Highways)
<b>Total</b>	<b>£9,129,603</b>	-

*5 Conclusions and Recommendations This testing demonstrates that the North West Harpenden strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.*

## 5.12 West of London Colney Strategic Site Viability Report (2024) (INF 10.12)

**Table 3.2.11.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£3,827,412	Based on £11,813 per unit
Healthcare	£680,000	Based on ARUP Costings
Sports & Community	£1,073,721	Based on Arup Costings
Green infrastructure:		
Local open/play Space/Green Infrastructure	£484,962	Based on ARUP Costings
Transport Infrastructure	£4,317,624	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £6,500 per home for transport requirements (e.g. Highways)
<b>Total</b>	<b>£10,383,719</b>	-

*5 Conclusions and Recommendations This testing demonstrates that the West of London Colney strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.*

## 5.13 West of Redbourn Strategic Site Viability Report (2024) (INF 10.13)

**Table 3.2.11.1: Section 106 contributions**

Contribution description	Contribution	Comments on contribution
Education	£6,438,085	Based on £11,813 per unit
Healthcare	£990,000	Based on ARUP Costings
Sports and Community	£1,642,695	Based on Arup Costings
Green infrastructure:		
Local open/play Space/Green Infrastructure	£815,754	Based on ARUP Costings
Transport Infrastructure	£7,262,670	£6,826 per home for active travel (index linked in accordance with HCC developer contributions toolkit) £6,500 per home for transport requirements (e.g. Highways)
<b>Total</b>	<b>£21,199,426</b>	-

*5 Conclusions and Recommendations This testing demonstrates that the West of Redbourn strategic site is viable and developable having regard to both the Council's planning policy requirements including 40% affordable housing and additional planning policies as set out in our LPVS.*

## 5.14 In terms of deliverability, all sites allocated in the draft Plan have been actively promoted by the relevant landowners/developers and for the Broad Locations they

have nearly all confirmed that they can deliver the necessary key development requirements as set out in Part B (site B7 does not currently have a SoCG because of its live planning application process). Relevant SoCG are agreed as set out below:

- Statement of Common Ground between SADC and The Crown estate (SADC/ED12)
- Statement of Common Ground between SADC and Bloor Homes (SADC/ED13)
- Statement of Common Ground between SADC and Crest Nicholson (SADC/ED14)
- Statement of Common Ground between SADC and Oaklands College & Taylor Wimpey (SADC/ED15)
- Statement of Common Ground between SADC and Glinwell PLC (SADC/ED16)
- Statement of Common Ground between SADC and The Ivory Family (SADC/ED17)
- Statement of Common Ground between SADC and Saucy View Lodge (SADC/ED18)
- Statement of Common Ground between SADC and Trustees of Simmons Trust and Mr & Mrs Wimms (SADC/ED19)
- Statement of Common Ground between SADC and Flamsteadbury Farm (SADC/ED20)
- Statement of Common Ground between SADC and Cala Homes (SADC/ED21)
- Statement of Common Ground between SADC and Hertfordshire County Council Property (SADC/ED25)
- Statement of Common Ground between SADC and Pigeon (SADC/ED22)
- Statement of Common Ground between SADC and Richborough (SADC/ED26)
- Statement of Common Ground between SADC and Miller Homes (SADC/ED27)

23. The Methodology Paper highlights that some sites that were not recommended for further consideration by the Green Belt Stage 2 assessment were still recommended to progress by the proformas. Reasons included their location next to a Tier 1 or Tier 2 settlement and potential to deliver sustainable development.

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

- 6.1 The approach taken is set out in more detail in the Site selection Methodology Paper at:

***Site Not Recommended by GBR Stage 2 that are Recommended to Progress by the Proformas***

*1.31 Some Green Belt sites that were not recommended for further consideration by the Green Belt Stage 2 were recommended to progress by the proformas due to the location of the site next to a Tier 1 or 2 settlement and the potential of the site to deliver a wide range of significant Economic, Environmental and Social benefits including housing, affordable housing, schools, and a significant scale of sustainable transport improvements and jobs.*

*1.32 Those sites within the Hemel Garden Communities (HGC) area will also support a comprehensive approach to the delivery of HGC including joint work with Dacorum BC to deliver Duty to Cooperate outcomes. As part of the overall HGC programme there are considerable further benefits including supporting delivery of schools, sports and health facilities and around 10,000 jobs across HGC and the Hertfordshire Innovation Quarter.*

- 6.2 The approach taken to the Site Selection Methodology had been discussed in public and agreed by Councillors at the Council's Local Plan Advisory Group (LPAG) and its successor the Planning Policy & Climate Committee (PP&C) between 2022 and 2024. The 23 September 2024 PP&C meeting received a report entitled "Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations" (at: <https://stalbans.moderngov.co.uk/ieListDocuments.aspx?CId=615&MIId=10958&Ver=4> which set out:

*3.1. The original Site Selection Methodology was agreed by the Local Plan Advisory Group (LPAG), on 14 June 2022. Work on the site assessment was undertaken following this methodology in draft form sufficiently to inform the draft Local Plan Regulation 18 document by June 2023. These draft outcomes were reported to LPAG and Planning Policy & Climate Committee (PP&C) in June and July 2023 This work has now been updated and completed to support the Regulation 19 draft Local Plan. At this stage further information has been included, such as the Strategic Flood Risk Assessment Level 2 that was completed in 2024, further work on Tree Preservation Orders, responses to the Regulation 18 consultation in 2023 etc. As always envisioned, the methodology is fundamentally similar to the original*

*agreed approach, but in taking the work forward some matters of detail have developed and evolved.*

*...*

*3.7. The outcome of the GBR Stage 2 (2023) was the recommendation of:*

- 54 sub-areas for further consideration in isolation – if removed from the Green Belt, these areas are unlikely to result in harm to the wider Green Belt; and*
- 29 sub-areas for further consideration in combination – if removed from the Green Belt in combination, these areas are unlikely to result in harm to the wider Green Belt but one of the constituent sub-areas could not be removed in isolation without resulting in harm.*

*3.8. These recommendations for further consideration are important in site selection and are key elements that inform the Proformas. The GBR Level 2, however, is not the only consideration for site selection and other criteria for suitability for the selection of sites in the Green Belt are part of the process that is set out in the Methodology agreed by LPAG and the Proformas.*

*...*

*3.21. Finally, there is a qualitative assessment of the site which draws together the Green Belt Review assessment, the major policy and environmental constraints, and any other relevant important information. The Proforma ends with a recommendation that the site either progresses or does not progress.*

*3.22. Some Green Belt sites that were not recommended for further consideration by the Green Belt Stage 2 were recommended to progress by the Proformas due to the location of the site next to a Tier 1, Tier 2 or Tier 3 settlement and the potential of the site to deliver a wide range of significant Economic, Environmental and Social benefits including housing, affordable housing, schools, and a significant scale of sustainable transport improvements and jobs.*

*3.23. Those sites within the Hemel Garden Communities (HGC) area will also support a comprehensive approach to the delivery of HGC including joint work with Dacorum BC to deliver Duty to Cooperate outcomes. As part of the overall HGC programme there are considerable further benefits including supporting delivery of schools, sports and health facilities and around 10,000 jobs across HGC and the Hertfordshire Innovation Quarter.*

- 6.3 The Site Selection Methodology had also been circulated to the September 2022 St Albans City and District Local Plan Duty to Cooperate Workshop and was discussed as an item on the Agenda, as set out in LPCD 06.01 – Duty to Cooperate Statement of Compliance at:

*Meeting agenda*

*...*

*4.Site Selection Methodology*

*4. Site Selection Methodology*



- *Summary of the site selection methodology.*
- *Summary of extent of sites being considered in the area.*
- *Encouraged comments from workshop participants on the 'Draft Site Selection Methodology (July 2022) circulated with the workshop invitation. Comments were invited during and after the workshop.*

- 6.4 The Council's approach did not differ from potentially sustainable development proposals in other Tiers of the hierarchy. All potentially sustainable development proposals in other Tiers of the hierarchy were taken forward through the Site Selection process and allocated in the draft Plan. This was the case for both urban and Green Belt potentially sustainable development proposals in other Tiers of the hierarchy.
- 6.5 The Site Selection process overall effectively took, in simple terms:
- all potentially sustainable development proposals that were available in the urban area
  - then all potential sustainable development proposals on Green Belt Previously Development Land
  - then all potential sustainable development proposals recommended for further consideration in the Green Belt Review (unless a specific reason ruled them out)
  - then, in order to achieve enough development capacity to meet the Standard Method for housing need figure in full, sites considered in the Green Belt Review (which were inherently in more sustainable locations than those not included in the Green Belt Review and would not cause 'holes' in the Green Belt) which offered significant Economic, Environmental and Social benefits.
- 6.6 This consideration of significant Economic, Environmental and Social benefits included a judgment on the sustainability of the proposal based on its location in the settlement hierarchy, because the higher Tier settlements offer, as set out in the Plan at 1.33:
- ...This approach gives priority to the larger urban centres which can provide a greater range of services and facilities, supports the re-use of land within the urban areas, and can reduce the need to travel. These larger urban centres also offer greater accessibility by walking, cycling and public transport.*
- 6.7 For the avoidance of doubt, potentially sustainable development proposals in other Tiers of the hierarchy were all considered as part of the processes outlined above.
- 6.8 NB: The Site Selection Methodology report (LPSS 02.02) paraphrased in paragraph 23 above should also have mentioned Tier 3 as well as Tier 1 and 2 as that was part of the approach taken. The minor error was in the LPSS 02.02 document. The correct inclusion of Tier 3 was set out in the 23 September PP&C report at paragraph 3.23 set out above. It can be noted that site B6 West of London Colney adjoins a Tier 3 settlement and was recommended to progress for further consideration through the Site Selection process and was then allocated in the draft Plan.



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

- 7.1 As set out above in response to M3 I5 Q6:  
*The approach taken to the Site Selection Methodology had been discussed in public and agreed by Councillors at the Council's Local Plan Advisory Group (LPAG) and its successor the Planning Policy & Climate Committee (PP&C) between 2022 and 2024. The 23 September 2024 PP&C meeting received a report entitled "Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations" (at: <https://stalbands.moderngov.co.uk/ieListDocuments.aspx?CId=615&MId=10958&Ver=4>)*
- 7.2 This same 23 September 2024 PP&C report further set out:  
  
*Site Allocations*  
  
*3.25. The initial draft Site Selection process set out above and in the Appendices lead directly to the draft Local Plan Regulation 18 Site Allocations in 2023. The updated and finalised Site Selection process set out above and in the Appendices leads directly to the draft Local Plan Regulation 19 Site Allocations set out in another report on the Agenda.*
- 7.3 A further report to the 23 September PP&C meeting was entitled " Draft Local Plan for Regulation 19 Publication" at:  
<https://stalbands.moderngov.co.uk/ieListDocuments.aspx?CId=615&MId=10958&Ver=4>
- 7.4 The Members of PP&C decided to allocate the sites in the draft Plan on the basis of their consideration of all the matters over the previous meetings and then specifically the two reports outlined above. Full Council also considered and decided to agree the allocations proposed by PP&C at its meeting on 16 October 2024.
- 7.5 For the avoidance of doubt, both PP&C and Full Council considered the Sustainability Appraisal report (LPCD 03.01) which itself considered the Site Selection process.

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

- 8.1 Yes, the site selection process was robust. As set out in more detail in the answers to M2 I5 Qs1-7 above, an appropriate selection of potential sites were assessed, and appropriate criteria taken into account. As set out in concise terms at paragraph 6.5 above:

*The Site Selection process overall effectively took, in simple terms:*

- *all potentially sustainable development proposals that were available in the urban area*
- *then all potential sustainable development proposals on Green Belt Previously Development Land*
- *then all potential sustainable development proposals recommended for further consideration in the Green Belt Review (unless a specific reason ruled them out)*
- *then, in order to achieve enough development capacity to meet the Standard Method for housing need figure in full, sites considered in the Green Belt Review (which were inherently in more sustainable locations than those not included in the Green Belt Review and would not cause 'holes' in the Green Belt) which offered significant Economic, Environmental and Social benefits.*

- 8.2 The Site Selection process was considered and discussed on multiple occasions at public LPAG and PP&C meetings to ensure robustness. The Methodology was considered and discussed with a range of stakeholders at the September 2022 St Albans City and District Local Plan Duty to Cooperate Workshop.
- 8.3 Further, the Sustainability Appraisal process considered that an appropriate selection of potential sites were assessed, and appropriate criteria were taken into account