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By e-mail only: planning.policy@stalbans.gov.uk

8th March 2021

Dear Sir / Madam

NEW LOCAL PLAN (2020-2038) – SUSTAINABILITY APPRAISAL SCOPING REPORT AND LOCAL DEVELOPMENT SCHEME

On behalf of our client, Burhill Estates Limited, we enclose representations in response to the Council's New Local Plan (2020-2038) – Sustainability Appraisal Scoping Report, hereafter referred to as the 'SASR'. This letter also considers the Council's updated Local Development Scheme ('LDS') in respect of the evidence base.

INTRODUCTION

Burhill Estates is part of the wider Burhill Group (the 'Group') which was founded in 1926. Where appropriate the Group undertakes development activities on their sites and promotes land for alternative uses. This is done to not only improve the Group's existing assets and facilities but to assist Councils in delivering their housing requirements. The Group's substantial experience in development and construction, along with having the necessary access to capital, means they are in a strong position to bring sites forward.

These representations relate to promotion of Aldwickbury Park Golf Club ('the Site') which our client owns and which has been submitted to the Council's Call for Sites exercise. The Site extends to approximately 66 hectares (ha) and has the capacity to provide 600-650 homes of a range of types and sizes, including 40% affordable, as well as land to deliver a retirement village, a neighbourhood centre, a leisure facility (including gym and pool) and public open space. The Site is deliverable because it is available now, offers a suitable location for development now, with the realistic prospect that development will be delivered within five years. We therefore propose that the Site should be allocated through the New Local Plan (2020-2038) (the 'Plan').

LOCAL DEVELOPMENT SCHEME

The revised LDS was published in January 2021 proposing the timetable leading to the adoption of the Plan. As part of the Plan's evidence base, we support the Council's decision to conduct a new Green Belt Review.

As confirmed by the previous Green Belt Assessment (at paragraph 9.1.5), the assessment of sites was only undertaken at a strategic level and the small-sub areas identified were not exhaustive. We therefore support a new Green Belt Review being undertaken as the last ignored sites which could promote sustainable patterns of development in accordance with paragraph 138 of the National Planning Policy Framework ('NPPF').

SUSTAINABILITY APPRAISAL SCOPING REPORT

We set out below specific comments on the SASR.

Whilst we generally support the principle of the Sustainability Objectives ('SOs') set out at Table 5.1 of the SASR, we want to emphasise five specific areas in which the Council must focus, particularly in light of the Inspectors' findings from the Examination of the recently withdrawn Local Plan (2020-2036).

SO3 (Population) – Provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations

The NPPF at paragraph 59 sets the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed.

The housing evidence as referred to in paragraph A2.27 and shown at Table A6 (*Dwellings Completions on Previously Developed Land (2001/02 – 2019/20) (Source: Authority Monitoring Report)*) emphasises both the extent and impact of insufficient housing delivery over the last 20 years with this in part down to the inability of the Council being able to bring forward a sound Local Plan. As a consequence of not planning for the housing the District needs, the Council is only able to evidence a 2.5 years' housing land supply (paragraph A2.27).

With the Government's 2020 Standard Method for Local Housing Need ('LHN') setting the target at 893 dwellings per annum ('dpa'), it is vital that the Council brings forward a sound and credible spatial strategy that allocates sites that are in sustainable locations, can connect to and enhance existing infrastructure, and can be delivered quickly. This will ensure the Council is able to improve on the past years of poor performance which since 2001/2002 has averaged just 445 dpa.

As a direct consequence of poor delivery, it has impacted the level of affordable housing with just 17.2% in the last five years (2015/16 – 2019/20) (paragraph A2.28 / Table A7 – *Affordable housing as a proportion of all new (net) homes completed (Source: Authority Monitoring Report)*). This is significantly below the Council's anticipated target of 40% being delivered for developments of over 10 or more homes (from Policy L3 of the recently withdrawn Publication Draft Local Plan 2018 (2020-2036)). It is therefore imperative, for the rates of affordable housing delivery to increase given the *'house prices in St Albans are among the most expensive in England outside of London'* (paragraph A2.29).

We therefore support the LHN figure of 893 dpa but for this to be delivered, there will be a requirement to work proactively and look at greenfield sites. Not only are greenfield sites often quicker to develop, but they do not have the same remediation and/or higher than normal construction costs as brownfield sites and can therefore deliver a policy compliant level of affordable housing – such sites should be prioritised.

However, in consideration of the clear need for housing and for the delivery rates to increase, we are concerned with the Council's intended approach to meeting its requirements as set out at paragraph A8.4:

“The new Local Plan will therefore need to identify ways to limit new housing growth to the minimum possible and prioritise ways in which land can be released to protect best and most versatile land, land with mineral resource potential and land with ecological and landscape value”.

Planning Practice Guidance ('PPG') is clear that LHN figure 'provides a minimum number of homes to be planned for'¹. The LHN should not be a limit to growth and the Council should ensure the 893 dpa is the minimum delivered and this should be achieved by 'preparing policies to address this such as site allocations'².

The Council acknowledge at paragraph A8.3 that Green Belt release is highly likely. We therefore expect the Council to take a clear, fully evidenced and justified approach to assessing land within the Green Belt and the associated Review should form the basis of this – this approach will ensure accordance with paragraph 136 of the NPPF. In ensuring the Review is robust, we suggest sites that do not perform the purposes for which land is included in the Green Belt should be identified early as part of the site allocation process.

Whilst it is important to recognise the impact of development, we expect the Council to balance these alongside the application of national planning policy. We however have concerns that the ability to achieve SO3 will be impacted through the negative approach the Council is taking as set out in paragraph A8.4.

SO4 (Population) – Promote access to community infrastructure for all sections of society in sustainable locations

Closely aligned to SO3, it is important that developments promote access to community infrastructure for all in sustainable locations. Two of the indicators in measuring the success of SO4 are:

- The area (ha) of accessible open space created; and
- The number of new community infrastructure facilities created.

Providing the necessary supporting infrastructure alongside housing development is vital in the delivery of healthy, safe and sustainable communities. A Site that can therefore deliver supporting social and environmental infrastructure including a health centre together with over 52 ha of public green space should form part of the Council's spatial strategy.

The benefits of developments including large areas of green and blue infrastructure are recognised at paragraph A1.18 (note this should be paragraph A1.19) including, 'enhanced wellbeing, outdoor recreation

¹ Paragraph: 001 Reference ID: 68-001-20190722

² Paragraph: 001 Reference ID: 2a-001-20190220

and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk. These benefits are also known as ecosystem services’.

The benefits of the natural environment and the weight attached by the public has increased through COVID-19 and with the Council needing to deliver a minimum of 893 dpa, the importance of being able to provide supporting community infrastructure that promote healthy lifestyles should be prioritised. Sites that can deliver this objective should be scored as ‘++’ (a strongly positive effect (Table 5.3 – Assessment criteria)).

SO6 (Human Health) – Support active and healthy communities

SO6 is aligned closely to SO4 and the two indicators used in measuring its success are:

- Provision of new play spaces (number and sqm created) – annual; and
- New community infrastructure (Use Class F1) (sqm) – annual.

We have not repeated the comments as set out in response to SO4 but sites that can provide new play spaces and community infrastructure in supporting active and healthy communities should be scored as ‘++’ (a strongly positive effect (Table 5.3 – Assessment criteria)).

SO9 (Water) – Minimise the risk of flooding

In allocating sites, the Plan must anticipate the consequences of climate change. Sites which are therefore within areas of lowest flood risk (Flood Zone 1) should be scored as ‘++’ (a strongly positive effect (Table 5.3 – Assessment criteria)).

SO16 (Landscape) – Maintain and enhance the quality of the countryside and landscape

The role of Green Infrastructure and its ability to soften the transition between urban and rural landscapes is acknowledged at paragraph A1.19 and sites which through a careful and considered design can mitigate their impacts, should be scored ‘++’ (a strongly positive effect (Table 5.3 – Assessment criteria)).

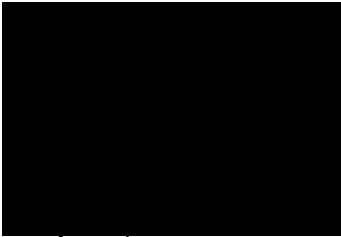
SUMMARY AND CONCLUSION

Whilst we broadly support the objectives in the SASR, we have identified the ones which the Council should prioritise in delivering a sound Local Plan.

We support the Council’s decision to undertake a new Green Belt Review which is to be produced in accordance with requirements of the NPPF and we expect a far more detailed approach to site assessments, influenced by the objectives of the SASR.

We trust the comments provided are useful, but should you have any queries, please do not hesitate to contact me. We would appreciate being kept informed as to the progression of the Local Plan 2020-2038, including any subsequent stages of consultation.

Yours faithfully



Associate



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BY EMAIL

24101/A3/DM/sjo

02 March 2021

Dear Mr Briggs

**ST ALBANS CITY AND DISTRICT – NEW LOCAL PLAN
CALL FOR SITES/SUSTAINABILITY APPRAISAL SCOPING REPORT (25 JAN – 08 MAR 2021)
REPRESENTATIONS ON BEHALF OF CREST NICHOLSON**

1.0 Introduction

We are acting on behalf of Crest Nicholson with regard to land at Lower Luton Road, Harpenden. The Crest site forms part of the wider Broad Location at North-East Harpenden, as identified in the recently withdrawn (Nov 2020) Local Plan for SACDC.

Since the withdrawal of the Local Plan from Examination, SACDC has published a Local Development Scheme (Jan 2021). This sets out a timetable for work on a new Local Plan, as follows:

Table 1: New Local Plan timetable

Stage	Date
Reg 18 Local Plan Consultation	Jan/Feb 2022
Reg 19 Pre-Submission Local Plan Consultation	Nov/Dec 2022
Submission of Local Plan	Spring/Summer 2023
Examination of Local Plan	Summer/Autumn 2023
Adoption of Local Plan	End of 2023

We broadly support the above steps, and in this regard, we note of recent Government guidance on the requirement for up-to-date Local Plans to be in place by December 2023.

This letter relates to the current consultation undertaken by SACDC (25 Jan – 08 Mar 2021), with regard to:

- a) Call for Sites; and
- b) Sustainability Appraisal – Scoping Report.

We note the objective of the Call for Sites exercise in seeking the submission of new sites only – i.e. those not previously considered/assessed by SACDC.

Given that our client's site was the subject of previous extensive assessments as part of SACDC's SHLAA and "Development Site and Strategy Options Evaluation" (DSSOE) processes, we provide only a brief update on the site proposals below.

We also comment upon the published Sustainability Appraisal – Scoping Report having regard to the guidance set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).

2.0 Call for Sites

Crest continues to promote land at Lower Luton Road, Harpenden. As above, the Crest land forms part of the wider Broad Location at North-East Harpenden which also contains 3 no. other landholding parcels.

We can confirm the commitment of Crest to continue to work collaboratively with other landowners in bringing forward comprehensive proposals for the NE Harpenden Broad Location. Equally, Crest is also committed to working cooperatively, proactively, and productively with SACDC (and all relevant partners) in bringing the site forward.

This commitment was set out in a signed Statement of Common Ground (between the landowner parties and SACDC – 12 Dec 2019) and we can confirm that Crest remains committed to the terms of the SOCG.

The withdrawn Local Plan identified the Broad Location at NE Harpenden at Policy S6 (vii). Our previous representations provided a thorough overview of the technical considerations for the site, as included in our Vision Document (Feb 2018). The Masterplan options contained within the Vision Document sought to meet the aspirations of Policy S6 (vii), as follows:

- Ability of the site to deliver approx. 760 dwellings – as secured within 60% built-form coverage of the site at an average density of 40 dph;
- The remaining 40% of the site provided as open space/green infrastructure largely within the northern part of the site, in accordance with the SKM (2013) Green Belt Review;
- 40% affordable homes, including potential for Starter Homes;
- Approximately 3% plots for Self and Custom-Build opportunities;
- Local Centre including retail/pharmacy and community uses;
- 2 FE Primary School (encompassing Early Years provision);
- Flexi-care development for older people (60 units);
- Specialist residential accommodation (10 units);
- Potential for GP/medical care space to be accommodated along with Flexi-care development;
- Significant areas of public open space;
- Sports pitches and children's play facilities; and
- Extensive pedestrian and cycle links through the site into Harpenden town and to nearby local facilities.

Crest reiterates its commitment towards the delivery of the proposals as above in collaboration with other site landowners. As set out in our previous submissions, Crest considers that the site is unencumbered by large-scale/strategic infrastructure requirements (e.g. road/rail) and could come forward (delivering the above) in the short-medium term.

3.0 Sustainability Appraisal – Scoping Report

The SA Scoping Report is a “high-level” document. It seeks to set out a methodology for detailed SA work at the relevant Local Plan stages. The proposed SA methodology is helpfully summarised at Figure 2 of the document, as consisting of the following:

- **Interim SA** (Reg 18 Local Plan consultation) – The Interim SA will test various options for growth as against 12no. proposed socio-economic and environmental indicators; and
- **Final SA** (Reg 19 Pre-Submission consultation) – The Final SA will demonstrate the effectiveness of the selected/preferred option for growth in sustainability terms, as against other options for growth.

The above work will be required to demonstrate the iterative process of the Local Plan/SA in shaping the spatial strategy for the City/District. In this context, the SEA Regulations (2004) require the Plan to ensure that “reasonable alternatives” are addressed at the relevant plan-making stage.

The document (Para 1.16) refers that the Local Plan will seek to secure both Broad Locations as well as site allocations. This commitment is supported, and it will ensure that housing needs are met in the City/District area both in the short and longer term.

SA Objectives

The SA proposes the provision of 16no. objectives to underpin the strategy for the Local Plan. These are summarised (at page 52 of the document) and relate to topic matters including, biodiversity, population, climate change, etc. The 16no. objectives are supported in broad terms.

We do however refer to objective “SO3” which obligates SACDC to:

Provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations

Whilst we recognise that the above objective complies with the NPPF (para 20), we consider that the objective could be re-worded to plan more positively for meeting housing needs. To provide a “sufficient” amount of housing suggests that just targeted need will be met without an additional buffer – we note that the withdrawn Local Plan sought to provide over and above identified need with an additional buffer of c. 10%. Providing a buffer would enhance choice and competition in the housing market as well as improve affordability issues in SACDC.

We would therefore recommend the following wording for “SO3”, which we note is set out elsewhere in the SA (Table 4.2):

Provide a sufficient amount **wide range of good quality housing which meets the needs of all sections of society in sustainable locations**

This objective will provide the framework for SACDC to meet the need for homes in the City/District area. The current need in St Albans amounts to 893dpa (Standard Method – Dec 2020), thus c. 15,000 units over a 15-year plan period.

Through recent discussions, SACDC has indicated that this will likely be met through:

- c. 5,000 units – urban/brownfield sites; and
- c. 10,000 units – within the Green Belt.

We recognise the recent attempts of SACDC to respond positively to housing need in the withdrawn Local Plan. The new Local Plan should continue in this vein, and in this context, our client’s site/wider

NE Harpenden Broad Location provides a "suitable", "available", "achievable" and "deliverable" opportunity to respond positively to meeting housing needs in the Green Belt.

We trust that the above information is helpful and please let me know should you have any queries. If it would assist further, we would welcome the opportunity of meeting with you to discuss the content of these representations.

Yours sincerely



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Date: 3 March 2021

Dear Chris,

Thank you for consulting us on the Draft Sustainability Appraisal Scoping Report for the new St Albans City and District Council Local Plan 2020-2038.

Our response attempts to address the six questions raised in the consultation email dated 25 January 2021. We hope that you find our comments useful and we would be pleased to meet with you to discuss in more detail any issues or queries you may have.

1) Are there any other relevant policies, plans or programmes which will affect the Local Plan and should be added?

It is positive to see references to the following documents:

- 25 Year Environment Plan (2018)
- Water Framework Directive (WFD)
- Flood and Water Management Act 2010
- Meeting our Future Water Needs: a National Framework for Water Resources (2020) (Environment Agency)
- Flood and Coastal Erosion Risk Management Policy Statement (2020)
- Water stressed areas – final classification (2013) (Environment Agency)
- State of the environment: water resources report (2018) (Environment Agency)
- The Environment Agency's approach to groundwater protection (2018)
- Thames River Basin Management Plan (2015)
- Affinity Water's Water Resources Management Plan (2020)
- SW Herts Water Study (2017)
- SW Herts Strategic Flood Risk Assessment (SFRA) Level 1 (2019)
- Hertfordshire Biodiversity Action Plan
- Hertfordshire Local Flood Risk Management Study

Table 2.1 (a) biodiversity (d) flora and (e) fauna:

We recommend the use of most recent version of the [The Biodiversity Metric](#). We expect version 3.0 to be published later this spring, alongside updated guidance. Additionally, we recommend you review Box 4.1 of the [CIEEM practical guide](#), which includes a quite helpful checklist for putting together a strong Biodiversity Net Gain policy.

Table 2.4 (f) soil

We recommend you include the [Environment Agency Land Contamination Risk Management \(LCRM\)](#) in this table, which supports the aim of effectively managing contaminated land.

Table 2.5 (g) water

We recommend the inclusion of the [National Flood and Coastal Erosion Risk Management Strategy for England \(2020\)](#), which sets out our vision for being prepared for and resilient to flooding and coastal change up until the year 2100.

In support of your aim to protect and enhance water flow and quality, including pollution, the Environment Agency's [Catchment Data Explorer](#) is also a useful resource. It provides access to the actions and measures needed across the waterbodies and to improve the water environment.

Our 'Water Stressed Areas Final Classification (2013)' is a primary source of evidence which supports a tighter water efficiency standard. It would also be strongly encouraged to outline water resources and efficiency within the sustainability appraisal, with reference to the standards to meet both the Building Regulations Part G and the BREEAM assessments for 'excellent' ratings for water efficiency.

Table 2.7 (i) climatic factors

Tackling climate change remains one of the biggest national challenges and is a central objective of the [Environment Agency 5 Year Plan](#) and [Department for Environment, Food and Rural Affairs \(DEFRA\) 25 Year Plan](#).

Within the national and regional context review section we also recommend referencing the following:

- [Planning for the future White Paper \(2020\)](#)
- [Draft Environment Bill \(2020\)](#)
- [Flood Risk and Coastal Change guidance \(2014\)](#)

2) Can anything be added to the baseline information collected and documented?

As mentioned above, we are pleased that the Level 1 SW Herts Strategic Flood Risk Assessment (SFRA) (2019) has been included in the evidence base. It is important to note that a St Albans Level 2 SFRA and a Sequential Test will be required for site allocations with flood zones, and so this needs to be available prior to Regulation 18 consultation. The Local Development Scheme timeline should also take this into consideration.

3) Do you agree with the Sustainability Appraisal objectives?

Below we have identified the relevant SA objectives within our remit, along with our comments.

SO1 – Protect, maintain and enhance biodiversity in the district

Throughout the SA scoping report there is no mention of Biodiversity Net Gain. The government's intentions have been made clear in the draft Environment Bill and Planning for the Future White Paper, and we anticipate legislation for a mandatory 10% Biodiversity Net Gain. We also encourage a consideration of Net Gain as it is referenced in the revised National Planning Policy Framework (NPPF) (paragraphs 170,

174 and 175). We recommend Net Gain is considered in line with industry best practice, guidance for which has been provided by [CIEEM](#).

We recommend that SO1 is measured by all development demonstrating a minimum 10% biodiversity net gain, using the most recent version of [The Biodiversity Metric](#) as a key indicator, even where development proposals do not result in biodiversity loss. A proportionate ecological survey and Biodiversity Net Gain assessment should be requested for all new development.

The indicators and measurement column can also be amended to include the need for long-term monitoring and maintenance plans for biodiversity and habitat proposals for a minimum period of 30 years, including both on-and off-site measures.

Some examples of where other councils have started to make provisions for net gain can be found using the links below:

- Policy SCLP10.1: Biodiversity and Geodiversity - <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>
- Policy GM-G 9 Standards for a Greener Greater Manchester - https://www.greatermanchester-ca.gov.uk/media/1710/gm_plan_for_homes_jobs_and_the_environment_1101-web.pdf

SO7 – Minimise development on best and most versatile agricultural land and minimise the degradation/loss of soils due to new development

We are pleased that supplementary question of whether the policy will ‘reduce the amount of contaminated land’ is raised. However, this should extend to considering land contamination and ensuring all development is in an appropriate location, for example not putting potentially contaminative development in areas with sensitive groundwater.

We recommend the [Environment Agency Land Contamination Risk Management \(LCRM\)](#) and [The Environment Agency’s approach to groundwater protection \(2018\)](#) are referenced to in support of this sustainability objective.

SO8 – Conserve and enhance water quality and flow in St Albans and reduce the risk of water pollution

We are pleased that the Environment Agency is referenced in relation to measuring the status of or waterbodies, groundwater and surface water. In addition to this, the requirements of Water Framework Directive (WFD) and Thames River Basin Management Plan (TRBMP) should be listed as key indicators and means of measuring this sustainability objective.

[Affinity Water’s Water Resource Management Plan \(2020\)](#) identifies how Affinity will work to provide a reliable, resilient, efficient and affordable water supply between now and 2080, whilst also protecting the environment. It shows what demand and supply measures will be introduced to manage the longer term challenges of population increase, climate change, drought resilience and growing environmental needs. Reducing levels of water consumption is crucial to ensuring sustainable water supplies in future. In response, reducing the levels of consumption will help to counteract the reduction in resource availability as well as other proactive alterations.

As previously mentioned, it would also be strongly encouraged to outline water resources and efficiency within the sustainability appraisal with reference to the standards to meet both the Building Regulations Part G and the BREEAM assessments for 'excellent' ratings for water efficiency.

We are pleased to see the provision for waste water infrastructure is discussed in Appendix A. In particular, we note that Paragraph A5.4 acknowledges the risk of pollution from waste water with reference to the TRBMP, and waste water and sewage is mentioned in paragraph A8.10. We agree with the acknowledgment that St Albans will the need to work with Thames Water and consider upgrades in order to provide sufficient treatment capacity for sustainable development.

SO9 Minimise the risk of flooding

We recommend this objective is amended from 'minimise' to '*reduce* the risk of flooding'. We also suggest the supplementary questions are expanded upon, to state that no development will be permitted in flood zone 3b (FZ3b) (functional floodplains).

Additionally, we recommend this objective is amended to take into consideration the connection between flooding and climate change. Development must demonstrate that it is 'safe' for its lifetime, and this includes an assessment of the impact of climate change on flood risk on site and elsewhere. This comment also applies to sustainability appraisal objective 12 (SO12).

Whilst we are pleased that this objective will be measured in consideration of our consultee advice, the LPA is responsible for the overall decision and should be applying the sequential and exception tests for all development in flood zones 2 and 3. We recommend the indicators column is amended to incorporate this, and the SW Herts SFRA is referenced.

SO12 Promote adaptation and to climate change

The supplementary question 'improve connectivity of existing habitats' can be expanded upon by referencing green and blue infrastructure, de-culverting, WFD requirements and minimum 8 metre buffer zones.

Biodiversity Net Gain should also be referenced in this objective. We recommend that the indicator 'area of new habitat gained/loss as a result of development (ha) –annual' should be amended, as there should be no loss because all development should be demonstrating a minimum 10% biodiversity net gain.

In relation to the supplementary question 'support or maintain a balance between water supply and need', we recommend that water explicitly mentions and reference is made to using BREEAM standards of excellence as a measurement. We recommend that in areas of serious water stress (as identified in our report ([Water stressed areas - final classification](#))) a higher standard of a maximum of 110 litres per person per day is applied.

As mentioned in our comments on SO9, a key impact of climate change is extreme weather including rainfall, and therefore we recommend that the connection between flooding and climate change is considered. Development should assess the impact of climate change on flood risk on site and elsewhere.

4) Are there any issues relevant to the Local Plan which are not being addressed by this Scoping Report?

Groundwater protection

We are pleased to see referenced [The Environment Agency's Approach to Groundwater Protection](#). Groundwater is a precious resource within the area, providing drinking water and a source for the borough's chalk streams and therefore must be protected.

New development could result in the pollution, especially for sites situated in vulnerable groundwater areas with Source Protection Zones (SPZ) or on principal or secondary aquifers. In particular, sites where the previous land use suggests the potential presence of contamination or the proposed land use is potentially contaminative will need to be dealt with in a way which protects the underlying groundwater.

Flood Risk

The Local Plan must support effective management and reduction of surface water, fluvial, and groundwater flooding. As stated in the Level 1 SW Herts SFRA, "It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk (informed by the evidence in the SFRA)" and also, that "where possible, development will reduce flood risk overall".

We note that in this scoping report, the sequential test is only mentioned in relation to the NPPF (2019) in Table 2.5 (g) water. In accordance with the NPPF (paragraph 158), development should not be permitted if there are reasonable available sites appropriate for the proposed development in areas with lower probability of flooding. It is the responsibility of the local planning authority to determine if the sequential test has been applied and whether or not there are other sites available at lower flood risk.

No development should be permitted in functional floodplains (Flood Zone 3b), other than water compatible and essential infrastructure, which has first passed the Exception Test, as outlined in the NPPF and the SW Herts SFRA.

Paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the NPPF (2019) state the requirement to demonstrate development is 'safe' for its lifetime and this requires an assessment of the impact of climate change. The Local Plan should ensure that planning proposals assess the impact of climate change on flood risk on site and elsewhere. This assessment is required to identify the appropriateness of the location for the development, finished floor levels, safe access/egress and the potential need for floodplain storage compensation.

Buffer Zones

Buffer zones are critical to managing the impact of flood risk on floodplains, the impact of development on the structural integrity of flood defences and also provides adequate space for access for maintenance/emergency works along the river. Buffers are also critical to minimising disruption to the environment along rivers and encouraging biodiversity, supporting Water Framework Directive objectives and the Thames River Basin Management Plan. An undeveloped buffer zone of at least 8 metres between the top of the bank of any Main River and any new development should be encouraged. This is supported by the Level 1 SW Herts SFRA.

SuDS

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage

surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. In reference to the SW Herts Water Study's (2017) statement that to ease the pressure of the drainage systems, rainwater harvesting and retrofitting of SuDS should be required in planning policies.

Blue infrastructure

Paragraph A1.18 references green infrastructure and blue infrastructure. We suggest planning policy for watercourses is considered in its own right, similar to the approach taken by Dacorum and Watford Borough Councils.

Blue infrastructure is very important for St Albans and we recommend the Local Plan has a strong ambition to improve the connectivity of the river habitat and protect and enhance all watercourses.

The River Ver and Colne are globally rare chalk streams, and should be considered priority habitats and included within the category of sensitive environments, in order to fully embed their importance and need for protection. This is in line with the Hertfordshire Biodiversity Action Plan, which acknowledges that the Ver is one of the five rivers in the Thames region which is most seriously affected by low flows, and stresses the importance of enhancing the quality of Chalk Rivers. Furthermore, this reflects the objectives of the [Revitalising the River Ver Project](#).

Culverts

The Local Plan should support de-culverting and improving the WFD status of waterbodies, and refuse planning permission for any new culverts. Where de-culverting is not possible or will lead to increased flood risk, developers should undertake a survey of the culvert to assess its exact location, structural integrity, and how required improvements, access and maintenance will be possible throughout the lifetime of the development, and the impact of on flood risk.

Climate Change

In July 2019, St Albans declared a climate emergency. We would like to take this opportunity to remind you of the importance of demonstrating your commitment to tackling climate change in planning policy, to show that the Council is taking the climate emergency seriously. Planning is key to reducing carbon emissions and achieving Net Zero, but planning and climate change extends to other critical issues such as flooding, water efficiency, biodiversity etc.

5) Do you have any comments on the draft Sustainability Appraisal Framework and Assessment Rationale?

Please see our comments for question 3, concerning biodiversity net gain, contaminated land, WFD requirements, water quality, water efficiency and waste water, and flood risk.

6) Do you consider that this Scoping report meets the requirements of Stage A of the sustainability appraisal process?

Chapter 2

We consider this chapter to address the first requirement of Stage A by identifying other relevant policies, plans and programmes, and sustainability objectives.

As already mentioned, the sustainability appraisal can be strengthened by including the following documents in the evidence base:

- [Environment Agency Land Contamination Risk Management \(LCRM\) \(2020\)](#)
- [National Flood and Coastal Erosion Risk Management Strategy for England \(2020\)](#)
- [Flood Risk and Coastal Change guidance \(2014\)](#)
- [Planning for the future White Paper \(2020\)](#)
- [Draft Environment Bill \(2020\)](#)
- [CIEEM's Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide \(2019\)](#)
- The most recent version of the [The Biodiversity Metric](#)

Chapter 3

This chapter collects the baseline information which is the second requirement of stage A. As mentioned in our response to question 2, the Level 2 SW Herts SFRA will be required for site allocations with flood zones within their boundaries, and needs to be available prior to Regulation 18 consultation.

Chapter 4

This chapter identifies the majority of sustainability issues and problems in line with the third requirement of Stage A. However please take note of our comments and recommendations in response to questions 3 and 4, on biodiversity net gain, WFD requirements, de-culverting, buffer zones, water quality, water efficiency, waste water provision, flood risk, groundwater protection, contaminated land, and climate change.

Chapter 5

This chapter develops the sustainability appraisal framework, the fourth requirement of Stage A. Please see our comments above recommending how the rationale can be improved.

Chapter 6

We consider the fifth requirement of Stage A to have been successfully met through this consultation on the scope of the draft sustainability appraisal scoping report.

Final comments

Once again, thank you for consulting us on this Draft Sustainability Appraisal Scoping Report. We welcome the opportunity to meet with you and discuss comments and opportunities for St Albans.

Should you have any queries regarding this response, please contact me.

Yours sincerely


Sustainable Places Planning Advisor


E-mail - HNLsustainablePlaces@environment-agency.gov.uk



HARPENDEN TOWN COUNCIL

CLOSER TO THE COMMUNITY

Spatial Planning Team
St Albans City and District Council
Civic Centre
St Peters Street
St Albans
Herts AL1 3JE

26 February 2021

Dear Sirs

Re: Sustainability Appraisal Scoping Report consultation draft

Harpenden Town Council Planning Committee reviewed the above consultation document at the meeting on the 23 February 2021, and would like to submit the following observations:

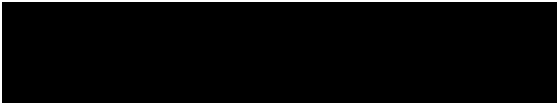
- The Report appears to be inconsistent throughout in not referring to St Albans City & District as a whole, instead referring to St Albans only. It is essential that the wider district including Harpenden and the Villages are considered.
- It is noted that in the introduction of the report, quite rightly, the work surrounding this document is taking place against the background of a period in a state of flux and notes the potential longer-term impacts of Covid-19 could be profound, especially with regards to work patterns including travel. However, weight needs to be added to the word "potential". It is difficult to see how a final appraisal report can be produced until greater clarity has been provided on the post Covid-19 situation.
- Point 1.13 of the Introduction refers to good regional transport connections. It is thought this to be true of North South but East West links are somewhat lacking.
- Reference is made in the Supplementary Questions Table 5.2 under SO4b, to active travel metrics around car travel levels to work. It is felt that this should include to school as well, as this contributes vastly to vehicle movements at certain times of day.
- Water usage is a major issue given the level of development being planned for. Tweaking round the edges/reduced consumption is felt not to be sufficient. There is a fundamental need for major infrastructure investment in water supply, whilst ensuring protection is afforded to the important and rare chalk streams present within the

district. It is appreciated, this matter may not lie directly in the St Albans Local Plan but still needs to be acted upon.

- The Report explains little on how people who, for whatever reason, are not IT enabled are included in the consultation process. This needs to be considered to ensure all stakeholders are included.

Harpenden Town Council very much look forward to being consulted on the full St Albans City and District Council Local Plan 2020-2038 update document when it becomes available for review.

Yours sincerely

A large black rectangular redaction box covering the signature of the Town Clerk.A small black rectangular redaction box covering the name of the Town Clerk.

Town Clerk.

Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Herts Middx Wildlife Trust
Address	St Michaels Street Grebe House St Albans AL3 4SN
Event Name	Sustainability Appraisal Scoping January 2021
Comment by	Herts Middx Wildlife Trust [REDACTED]
Comment ID	SAS1
Response Date	12/02/21 10:08
Consultation Point	Response Form (View)
Status	Submitted
Submission Type	Web
Version	0.1

Please provide your comments

There are 43 mentions of biodiversity in the scoping survey, but not one mention of biodiversity net gain. NPPF requires that development achieves a net gain in biodiversity, which should be measurable. It states:

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity

170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures

174. To protect and enhance biodiversity and geodiversity, plans should:

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

175. When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

The SA should reflect this imperative and explicitly state that the aim of planning decisions should be to secure measurable net gain to biodiversity. To do this it must specify that the Natural England Biodiversity Metric must be used to substantiate biodiversity net gain in all applications which impact negatively on biodiversity. The metric must show a minimum net gain of 10% to accord with the government standard, but it should consider increasing this to 30% to be consistent with the UN and UK government target of ensuring 30% of land be dedicated to support the recovery of nature.

In conjunction with this it should also state that priority habitats will be protected and buffered with complimentary habitat through development. Protected and priority species must also be protected and measures implemented through the planning process to identify them and increase their populations.

David Mosco

From: [REDACTED]
Sent: 05 March 2021 16:27
To: Planning Policy (SADC)
Subject: 12439 St. Albans City and District Council Local Plan 2020-2038 Update

For the attention of: Chris Briggs

Consultation: St Albans City and District Council Local Plan 2020-2038 Update

Highways England Ref: #12439

Dear Chris Briggs,

Thank you for your email of 25 January 2021 inviting Highways England to comment on the above consultations and indicating that a response was required by 8 March 2021.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

In the case of St Albans City and District Council, Highways England will be particularly interested in the Local Plan impacts on the SRN. This includes the M25, M1 and parts of the A414 in the district area. The St Albans City and District also includes several junctions of the SRN including the M1 Junctions 6,8 and 9, the M25 Junctions 21, 21a and 22 and the borough is also very close to the A1(M) at Junction 3.

We note that the Draft Statement of Community Involvement (SCI) states under its internal/ external consultation bodies that *"the Council may also consult a number of internal and external bodies when considering planning applications... However, appropriate consultation is undertaken as the nature of the application dictates. These consultations are undertaken because such bodies have a special interest in the application"*. Whilst it is noted that it states *"this list is not exhaustive"*, for the avoidance of doubt Highways England would expect to be consulted on any planning application that could have the potential to impact on the safety and/or operation of the SRN. Highways England notes we are included in Appendix A of the Draft SCI as a specific consultation body set out in the regulations.

In respect to the Council's Draft Sustainability Appraisal (SA), Highways England is encouraged by the inclusion of Policy SO10 - *Achieve good air quality across the district by supporting the improvement of air quality in the district's AQMAs in the spatial planning process* and Policy SO5 - *Encourage the use of active and sustainable means of transport and reduce the need for people to travel*. Whilst we have no specific comments on the scope of the Draft SA, as noted above we are encouraged by the inclusion of these policies.

Lastly, in response to the council inviting representations for a 'Call for Sites 2021', Highways England would like to advise the council that The Secretary of State for Transport does own and manage and a list of land available for sale is publicly accessible at the following website - <https://www.gov.uk/find-government-property>. Please therefore be advised that land that has been identified and is available for sale can be found on that website for your reference.

I hope you find these comments useful. We look forward to future engagement with St Albans City and District Council as your Local Plan develops. Please continue to consult us via our inbox: PlanningSE@highwaysengland.co.uk. I would also kindly ask that you include our East Office in your

database as a stakeholder (PlanningEE@highwaysengland.co.uk) to ensure they are informed over your Local Plan's progression.

Kind Regards,

[REDACTED]

[REDACTED]

Highways England | 1st Floor, Bridge House | Walnut Tree Close | Guildford | GU1 4LZ

[REDACTED] Please note that my telephone number has been diverted to my mobile.

Web: <http://www.highwaysengland.co.uk>



Highways England Company Limited | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ | Registered in England and Wales No. 9346363

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Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.



Sir/Madam Spatial Planning Team
St Albans City & District Council
Civic Centre
St Peters Street
St Albans
Hertfordshire
AI1 3JE

Direct Dial: 01223 582748

Our ref: PL00736642

2 March 2021

Dear Sir/Madam Spatial Planning Team

Sustainability Appraisal Scoping Report for the St Albans City and District Local Plan 2020 - 2038 (Consultation Draft)

Thank you for consulting Historic England Sustainability Appraisal Scoping Report for the St Albans City and District Local Plan 2020 - 2038 (Consultation Draft).

As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on this Draft Sustainability Appraisal Scoping report.

SA Scoping - general approach

The historic environment should be considered as part of the sustainability appraisal process. We recommend that these comments should be read alongside our Advice Note 8. Our advice note provides more guidance to developing a robust sustainability appraisal framework.

Sustainability Appraisal and Strategic Environmental Assessment - Advice Note 8
<<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>>

Key Plans and Programmes

When considering key plans and programmes, we recommend the inclusion and consideration of the following:

International/European

- UNESCO World Heritage Convention
- European Landscape Convention
- The Convention for the Protection of the Architectural Heritage of Europe
- The European Convention on the Protection of Archaeological Heritage

National





- Planning (Listed Buildings & Conservation Areas) Act 1990
- Ancient Monuments & Archaeological Areas Act 1979
- Marine and Coastal Areas Access Act 2009
- Government's statement on the Historic Environment
- National Planning Policy Framework
- National Planning Practice Guidance

Local

- Local Plans
- Historic Environment Record
- AONB Management Plans
- Heritage/Conservation Strategies
- Other Strategies (e.g. cultural or tourism)
- Conservation Area Character Appraisals and Management Plans
- Listed building Heritage Partnership Agreements

Baseline Information

All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, and Protected Wrecks) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas.

We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the City, Borough or District should be acknowledged and outlined in this section. Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.

Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.

Key Sustainability Issues

We would suggest that the starting point for considering Key Sustainability Issues for the Historic Environment should include:

- Conserving and enhancing designated and non-designated heritage assets and the contribution made to their significance by their settings;





- Heritage assets at risk from neglect, decay, or development pressures;
- Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it;
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

We would expect to see consideration of opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities. Example opportunities for the historic environment to include within the Sustainability Appraisal can be found in our guidance notes in the links above.

Method for Generation of Alternatives

The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets (including as a result of development in their settings) should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.

In order to differentiate between sites, the SA will need to identify where there is potential for development in each location to give rise to effects to heritage assets and their significance. To inform this work Heritage Impact Assessments (HIA) may be needed to provide a proportionate understanding of the significance and sensitivity to change of heritage assets both within sites and with the potential to experience setting change as a consequence of development. To provide meaningful inputs to the SA the Council will need to identify:

- Known heritage assets with potential to experience effects as a consequence of development;
 - The significance of those assets, including the contribution made by setting;
 - The sensitivity of that significance to change as a consequence of development.
- Physical change, for assets within potential development boundaries; and
- Setting change for assets outside potential development boundaries.
- Designated heritage assets on Historic England's Heritage at Risk Register, and





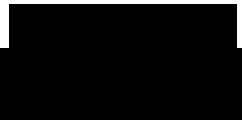
- any opportunities for development to address the reasons for their inclusion.
- Potential risk / level of harm to significance as a consequence of development on site.

Our advice note provides more guidance on assessing sites in relation to the historic environment:

The Historic Environment and Site Allocations in Local Plans - Advice Note 3
<<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>>

Conclusion

We would encourage local authorities to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Sustainability Appraisal. Our advice note provides more guidance to developing a robust sustainability appraisal framework.



Historic Environment Planning Adviser, Planning Group



Planning Policy
St Albans Council Offices
St Peter Street
St Albans
Hertfordshire
AL1 3JW

Date: 8 March 2021
Our ref: 60885/01/SSL/JWO/19514859v1
Your ref:

Dear Sir/Madam

New Local Plan 2020-2038

Response to Call for Sites 2021, Draft Statement of Community Involvement and Sustainability Appraisal Scoping Report Consultation

On behalf of our client, Legal & General Capital (hereafter “L&G”), we write in response to the consultation on St Albans City and District Council (SACDC) new Local Plan 2020-2038 which includes a Call for Sites 2021 process, a Draft Statement of Community Involvement and Sustainability Appraisal Scoping Report. L&G welcomes the opportunity to participate in this consultation.

Land at North West Harpenden (NWH)

These representations are made in the context of L&G’s long-term interest in land at ‘North West Harpenden’ within St Albans District. L&G own the majority of the ‘North West Harpenden’ Broad Location Site, previously identified for development in the now withdrawn SACDC Draft Local Plan (2020 – 2036) and prior to that in the draft Strategic and Detailed Local Plans, also withdrawn. The site has been promoted for a number of years by L&G for residential development including c.580 homes, the provision of a 2FE primary school site, allotments, and associated landscaping and infrastructure.

Site Background

The NWH site is currently within the Metropolitan Green Belt and is located north-east of Luton Road on the north-western edge of Harpenden. It is generally defined by Luton Road, field boundaries to the north of Cooters End Lane, by Ambrose Lane to the north-east, and by existing residential properties on Bloomfield Road to the south-east. The site includes an area of approximately 25 hectares. The site is primarily in agricultural use (crops) and is part of a wider landholding which could provide adjacent opportunities for mitigation and biodiversity enhancement.

There are significant level changes on the site, which generally falls from the east to the west (Ambrose Lane to Luton Road). The areas north-east of both Luton Road (north of Cooters End Lane) and Ambrose Lane are generally more level.

The site is surrounded on two sides (south-west and south-east) by existing residential areas. The area to the north is primarily in agricultural use. To the north-west on Ambrose Lane (and adjacent to the proposed school site) is the King's School, a private secondary school. Nearby on Ambrose Lane is Ambrose Wood, an area of ancient woodland, a Spire private hospital, and the Oval, a training centre and community facility run on a charitable basis by YWAM. Cooters End Farm on Cooters End Lane is Grade II listed and falls outside of the site boundary and L&G's ownership.

To the south-west of the site on Luton Road is a public house (The Bell, Grade II Listed) and a small parade of local shops. The site is located approximately 2km north-west of Harpenden town centre, 8km south of Luton and 8km north/north-west of St Albans, both of which provide a wider range of higher order retail and service facilities.

The nearest train station is in Harpenden, approximately 2.5km from the site, with regular bus services (northbound towards Luton and Southbound towards Harpenden/St Albans) available from stops on Luton Road.

The site is therefore already well connected to a range of local facilities, services and transport connections.

L&G has undertaken extensive discussions with SACDC as part of the previous Local Plan preparation processes. In line with the requirements of the now withdrawn Local Plan (i.e. the masterplan Toolkit), the Council and L&G sought to manage the NWH Masterplanning process through a Planning Performance Agreement (PPA). This PPA set out the agreed ways of working between L&G, SACDC and the County Council (Hertfordshire County Council) (HCC). L&G and its consultant team began working on the Masterplan process in Summer 2019 and L&G formally signed up to the PPA in February 2020.

As a result of the formal withdrawal of the draft Local Plan on 23 November 2020, the PPA process for the site was terminated on 18 January 2021 by SACDC.

L&G remains committed to providing new homes and associated facilities in Harpenden at the earliest opportunity and would be pleased to work with SACDC to support the preparation of the emerging Local Plan and secure the early delivery of a range of urgently needed new homes, including affordable housing.

Call for Sites

Attached to this letter is a completed 'Call for Sites 2021' Site Identification Form and a site location plan. The red line boundary on the plan identifies an area suitable for development which reflects the previous 'Broad Location' and an additional small area which could accommodate further development, associated infrastructure and landscaping. The plan also identifies an area (shaded green) which could be made available for new woodland planting, biodiversity enhancement and recreation use in the event the NWH site is allocated for residential development. For the avoidance of doubt, it is not currently L&G's expectation that this land would be offered for planting which is unrelated to development at NWH.

The NWH site is suitable for housing and does not have any abnormal constraints or requirements. The site has been identified by SACDC since 2014 as a suitable location for residential-led development. Given its scale and location, the site can contribute to meeting housing needs early in the plan period. It is intended that the likely timescale for the delivery of the first phase of the development will be within 1-5 years of the plan adoption. The site presents an opportunity for a sustainable integrated and well-connected extension to the Harpenden urban area.

As discussed above, the NWH site had progressed to an advanced stage in the Masterplanning process under the previous draft Local Plan, and both a Design Review Panel and local consultation events indicated support for L&G's design approach. Further, while the process was paused before a full draft Masterplan had

been prepared, the regular workshops with Officers from both the District and County Council's established an agreed approach across a range of design issues. For reference and to assist in the consideration of the site in the Council's 2021 Call for Sites process, the proposed site development previously included plans for:

- Up to 580 homes of a variety of tenure and size (including 40% affordable provision) including a Flexi-care facility of up to 50 bedrooms;
- A 2.5 ha site for a two-form entry primary school;
- Allotment and orchard space;
- Parkland and landscaping;
- New pedestrian and cycle routes through the site;
- Associated infrastructure and access works. Two primary access and egress points to the site were to be provided via Luton Road; with secondary access via Cooters End Lane, and potentially Ambrose Lane
- An area of new woodland and additional green space to be provided within the remaining Green Belt beyond the development parcels/emerging allocation but on land also owned by the applicant

While L&G would review any future scheme based on the policy and commercial context which exists at that time, we anticipate that the broad nature and scale of development established through the Masterplanning process could be achievable. L&G will also consider the environmental performance of the development at the detailed design stage with due regard to available construction methods and technologies.

Given L&G's wider landholding locally there is an opportunity for L&G to accommodate additional development and provide an area for mitigation beyond the areas identified on the accompanying plan should the Council wish to explore the opportunity for additional development or an extended allocation in this location.

Finally, L&G would welcome an allocation for development which provides for (at least) any school buildings required to be accommodated on land released from the Green Belt as part of a general release. This approach will enable any future stages of the design process to approach the masterplanning of the NWH area on a less constrained basis and ensure that the most appropriate mitigation to address any effects can be sought.

Draft Statement of Community Involvement

As part of the consultation we have reviewed the Draft Statement of Community Involvement (DSCI) on behalf of L&G.

The table on page 17 of the DSCI states that for Significant Major Proposals (50 dwellings or more, on land more than 5 hectares, 10,000sqm of non-residential floorspace, development that requires an Environmental Impact Assessment), pre-application consultation is generally recommended in line with that of Major Proposals. These elements appear reasonable and proportionate. However, the DSCI states that for Significant Major Development applications, consideration should be given to the use of Community Charrettes at an early design stage using organisations such as Look! St Albans. We ask that clarification of this process and the expectations for applicants should be included within the DSCI, and that if this recommendation is maintained it is made clear that applicants are free to employ the services of any suitable consultant or organisation. It will be important to understand the expectations around this recommendation, as an addition to the already wide ranging consultation processes. Specifically, we request clarity on how this activity will be coordinated with a Design Review Panel process which is also included within the DSCI.

Paragraph 6.7 of the DSCI outlines the Council's proposed consultation process on a range of planning applications. For major developments the consultation method proposed is over and above the requirements within the Town and Country Planning (Development Management Procedure) (England) Order 2015. Within the Order 21 days is allowed for the consultation process. However, the DSCI refers to a 25 day consultation. The SCI should be amended to be in line with national legislation.

Paragraph 6.16 refers to potential amendments to planning applications and states that "*any amendment will depend upon the time left in which to determine the application and whether neighbour notification is required as a result of the amendment*". In line with the NPPF, the DSCI should approach the decision making process in a positive and creative way and work with applicants to secure developments that will improve the economic, social and environmental conditions of the area (paragraph 38 of the NPPF). Whilst it is acknowledged that timescales are a key measurable in the planning determination process, the acceptability of any amendments should not be determined based on the target determination date.

The DSCI includes reference to Development Briefs in paragraphs 6.20-6.21. Clarity on when and at what stage of the pre-application process a development brief will be prepared would be beneficial. In addition, it would be helpful if the SCI could include details of the responsibilities for the owner/applicant of the relevant site in this process.

Sustainability Appraisal Scoping Report (SASR)

We do not provide detailed comments on the SASR, but welcome the acknowledgement in the SASR that without an adopted Local Plan there will be an even greater shortage of housing, which would particularly affect young families wanting to get on the housing ladder as well as the provision of affordable housing to meet the needs of lower income groups.

It is also noted that the SA confirms that "*while some new housing will inevitably continue to come forward from brownfield land and from other reforms to permitted development rights introduced in recent years, the council is highly likely to have to consider releases of Green Belt land if it cannot find a neighbouring authority to cooperate and take some of the district's requirements*" (para A8.3).

Conclusion

We trust the above comments are helpful and will be considered as part of the development of the draft Local Plan. Please do not hesitate to contact Nick Baker or Jennifer Woods to discuss these representations and/or to facilitate discussions with our client.

We also look forward to receiving details of the progress of the future consultation stages of the Local Plan.

Yours faithfully


Lichfields

Copy 



St Albans City & District Council

By email: planning.policy@stalbans.gov.uk

1 March 2021

Dear Sirs,

Local Plan 2020-2038

London Colney Parish Council would like to register the following comments in relation to the latest consultation process for the Local Plan.

Statement of Community Involvement

Members considered this document and noted how the District Council were going to engage with residents, especially in relation to Covid 19. It was noted that there was a specific mention of Neighbourhood Planning and how this would be implemented in the Local Plan.

The District Council have already indicated that they are keen to use evidence base gathered for Neighbourhood Plans as part of their evidence base. Members considered that there is insufficient support from the District Council and felt that this approach would disadvantage parishes where neighbourhood planning is at the early stages, or there is no neighbourhood plan process.

Sustainability Appraisal

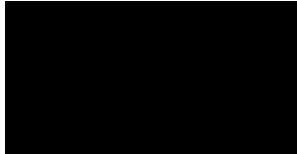
Members considered this document and were concerned about the level of detail within the document and whether they would be able to make relevant comments. We would like to register the following comments:

- Design on green belt sites should be landscaped led.
- Special consideration should be given to infrastructure and resources, in particular water.
- Vehicle assessments should be undertaken for each site including movements at junctions.
- Broad Colney Lakes is not listed as a Local Nature Reserve.
- The vacancy rate quoted on properties should be listed by individual sites including London Colney which is the third largest settlement in the district.
- Air quality monitoring should be objectively monitored depending on the sites where traffic movements were highest i.e., London Colney with A414, A1081 and M25.



Members considered the method of commenting on these documents was cumbersome and was not readily accessible to all residents. Other methods of consulting should be considered, now that the lifting of Covid 19 restrictions are planned.

Yours faithfully,



Clerk to London Colney Parish Council

Mr M [REDACTED] Ferguson [REDACTED]

Please provide your comments

I would like to see the sustainability approach set within the 'doughnut economics' framework the framework and following the example of relevant projects referenced here:
<https://doughnuteconomics.org>

Also to embrace the concepts of the circular economy, the 15-minute city <https://www.15minutecity.com>
and the meaningful city <https://ruthyeoman.co.uk/the-meaningful-city/>



SADC Draft Scoping Report for Sustainability Appraisal – Comments from Marshalswick North Residents Association

General

The document is welcomed in that it sets out the process by which the Sustainability Appraisal (SA) will be carried out.

The parish council notes the state of flux that the planning process is currently in and that this may impact on any future SA. We also note the comments made on the potential impact of COVID-19 on the future work and travel patterns in the district.

A Glossary should be provided as part of the document. The use of unexplained acronyms hampers transparency.

The Indicators sometimes do not cover all aspects of the Objective/Supplementary Questions. There should be provision for ongoing review of these indicators and the inclusion of further measures suggested/becoming available wherever relevant to an Objective.

Strategic Environmental Assessment (SEA)

The inclusion of the SEA within the SA is supported. However, the SA has to consider social and economic impacts as well as environmental. The draft scoping report appears to be weighted towards consideration of environmental impacts. Specifically, the chapters have been structured by topic consistent with the format set out in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004. Those topics do not specifically cover social and economic impact, although those impacts are covered within the population and human health headings.

Paragraph 5.10 sets out the potential conflicts and should be given greater prominence in the document.

Chapter 1

Paragraph 1.8

To avoid confusion the phrase “that may have other effects on spatial planning in St Albans” should be amended to read “that may have other effects on spatial planning in the district”. This would then be consistent with references to the district elsewhere in the document.

Paragraph 1.11



There are several mentions in this document to the Watling Chase Community Forest, but the plan for that forest does not appear to have been updated since 2001. The Council should seek to work with the other parties involved to update the plan for the forest.

Paragraph 1.16

There is a reference to “local planning authority”, that should be “local planning authority”.

Paragraph 1.17

Two references to “TRL” with no explanation as to what TRL is.

Paragraph 1.22

Given the proposed structure of the SA, following the format set out in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004, the last sentence should be revised to read “all references to ‘SA’ in this document should be taken to mean ‘SA as produced to comply with the requirements of the SEA Directive.’”

Other matters

The SA does not mention the Bromate Plume in Sandridge – page 39 of the document refers to water extraction, but does not mention the impact of the plume on that.

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Chapter 3

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We have grouped all comments on Chapter 5 under the relevant Sustainability Appraisal Objectives as set out in Table 5.1. These therefore include comments on suggested 'Supplementary Questions' and 'Indicators' set out in Table 5.2.

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The sentence "This section sets out a Sustainability Appraisal (SA) Framework which will be used to test new Local Plan against sustainability considerations." is missing the word "the" between "test" and "new".



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- bus stops 400m
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Objective: new major development should only be permitted alongside infrastructure improvements to facilitate active travel/transport.



The supplementary question should be more ambitious i.e. 'maintain **and** improve access to public transport **or other forms of sustainable passenger transport** (wording to reflect other forms of sustainable transport that may emerge e.g. through use of technology).

A specific indicator is needed for the kms of pedestrian or multi-user public rights of way/paths to capture whether this form of active travel is also increasing.

Use could be made of HCC traffic surveys. Measurement should not only be of car or passenger transport for getting to work purposes but more generally.

Consideration should be given to the use of the concept of 15 minutes neighbourhoods to assess new developments and improve existing neighbourhoods.

SO6 (ps 52, 56)

The supplementary question 'Site new development close to existing community infrastructure' **must** also include provision of additional community infrastructure as part of the development approval.

There should be a supplementary question 'encourage cooperation with Health partners and developers to ensure sufficient GP, primary and secondary care to maintain good health capacity for all changes in population?'

The indicators given are insufficient to measure the two supplementary questions.

SO7 (ps 52, 56)

Should there be an indicator which measures the quality of all agricultural land prior to development and takes this fully into account in any decision?

SO9 (ps 52,56)

There are numbers of existing areas in the district already subject to flooding during wet weather. These areas should be included as areas of flood risk – not just the Environment Agency's map. Use could be made of maps prepared by the county council.

SO10 (ps 52, 57)

'Good' air quality needs to be capable of measurement. The AQMAs only measure the very worst areas and are insufficient as a measure for 'good' or 'improved air quality. **The Objective should aim to improve air quality and to reduce harmful emissions.** The supplementary questions and measures should be more ambitious in sampling air quality across the district. As an example, HCC traffic surveys and measures of congestion at peak hour traffic could be used.

SO12 (ps 52, 57)



There are areas of heathland at both Nomansland Common and Colney Heath Common, which should also be considered when conducting the SA.

SO16 (ps 52, 59)

Surely a suitable supplementary question here is whether there is a 'made' neighbourhood plan in the area and what its provisions are?

Appendix A

Paragraph A0.1

In the sentence "This Appendix outlines sets out in more detail the baseline analysis carried out to support this Sustainability Appraisal" the word "outlines" should be deleted.

Paragraph A1.20

Butterfly World has ceased to operate and it is questionable whether the site should be included in this list. The country park at Ellenbrook has been established by the developer, but management of the park has yet to be transferred to a trust as set out in the relevant s.106 agreement. The sites listed all relate to initiatives within the last 30 years and the list does not include older sites such as various commons or Jersey Farm Woodland Park.

Paragraph A2.22

The opening of Katherine Warrington school in Harpenden will have mitigated the shortage of secondary school places and more up to date information should be obtained.

Paragraph A2.24

There is no mention of the University of Hertfordshire.

Paragraph A2.41

This statement about the local bus network to St Albans city centre is complacent and arguably factually inaccurate. Mention should be made of successive cuts to the frequency and extent of bus services to suburbs, and particularly to the outlying villages over the last 10 years. Covid-19 advice has produced artificially low bus usage over the last year but this should change as the pandemic becomes 'managed'. Any bus usage figures from March 2020 until these are unaffected by COVID-19 prevention advice cannot be taken as representative.

Paragraph A8.8



Westmill Landfill has reached capacity and if it has not already closed for Hertfordshire waste it will do shortly. There will then be no contracted disposal facilities in Hertfordshire.

[REDACTED]

Chairman

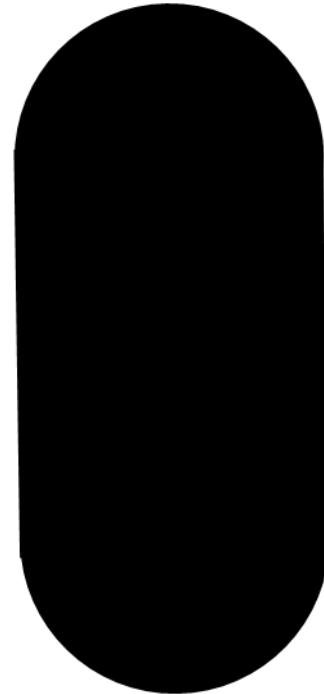
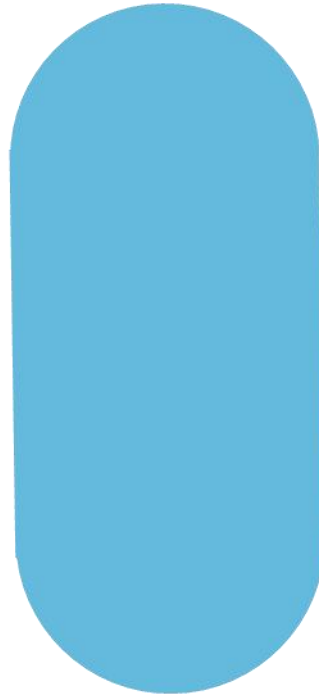
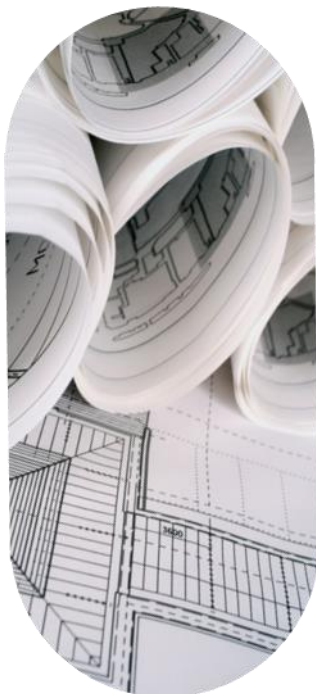
Marshalswick North Residents Association

7 March 2021

[REDACTED]

REPRESENTATION ON THE ST ALBANS LOCAL PLAN 2020-2038 SUSTAINABILITY APPRAISAL SCOPING

On behalf of Martin Grant Homes and Kearns Land Ltd



Waterfront House, Waterfront Plaza, 35 Station Street, Nottingham
www.marrons-planning.co.uk

1. INTRODUCTION

1.1 This Written Statement is made on behalf of our clients, Martin Grant Homes and Kearns Land Ltd, in response to the St Albans Local Plan 2020-2038 Sustainability Appraisal Scoping.

1.2 The Council is inviting comment on the Sustainability Appraisal Scoping until 5pm on Monday 8th March 2021.

2. BACKGROUND

2.1 A Sustainability Appraisal (SA) is an iterative process that seeks to identify the significant environmental, social and economic effects of a plan. As noted, it is a compulsory requirement for Local Plans under Section 19 of the Planning and Compulsory Purchase Act 2004. UK Government guidance states that “Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives” (DCLG, 2014).

2.2 The Council previously submitted a Local Plan for examination in March 2019. Following a prolonged examination process the examining Inspectors’ confirmed their view in writing on the 14 April 2020 that the council had not complied with its duty to cooperate set out in the Localism Act 2011.

2.3 The Inspectors’ Letter (ED40) not only noted non-compliance with its duty to cooperate it also set out a number of findings [including our emphasis]:

- *Failure to engage constructively and actively with neighbouring authorities on the strategic matters of (a) the Radlett Strategic Rail Freight Interchange proposal and (b) their ability to accommodate St Alban’s housing needs outside of the Green Belt;*
- *Plan preparation not in accordance with the Council’s Statement of Community Involvement;*

-
- *Inadequate evidence to support the Council's contention that exceptional circumstances exist to alter the boundaries of the Green Belt;*
 - *Failure of the Sustainability Appraisal to consider some seemingly credible and obvious reasonable alternatives to the policies and proposals of the plan;*
 - *Failure of the plan to meet objectively-assessed needs; and*
 - *Absence of key pieces of supporting evidence for the plan.*

2.4 The Council agreed to withdraw the plan on the 19 November 2020 and that act was undertaken the following day.

2.5 The Inspectors' letter includes specific explanations of shortcomings in the Sustainability Appraisal and there is a link between these and the plan preparation process including, but not limited to, the amount of development, development strategy, site identification and assessment and Green Belt Review (and indeed, the SA of these matters).

2.6 The Council is now proposing to produce a new Local Plan and the Sustainability Appraisal Scoping process signals the commencement of that process. In our view, the Council should systematically review the Inspectors' findings with a view to ensuring that the Sustainability Appraisal is capable of playing a full role in the plan-making process and ultimately providing robust support to decision making.

2.7 The Scoping Report considers the context and scope of an SA for the new Local Plan and establishes an assessment process to ensure that the policies and site allocations in the new Local Plan can be assessed against the three elements of sustainability (social, economic and environmental).

3. Policy Context

3.1 The National Planning Policy Framework (NPPF) confirms at paragraph

15 that the planning system should be genuinely plan-led. The presumption in favour of sustainable development applies to plan making and says that plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (paragraph 11).

3.2 NPPF Paragraph 32 recognises the legal requirement for local plans to be informed throughout their preparation by a sustainability appraisal demonstrating how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). It highlights that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

3.3 The National Planning Practice Guidance defines five different stages for the sustainability appraisal process, with the Scoping Report presenting the findings of Stage A of the SA process and setting the framework for tasks relating to Stages B to E.

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.
- Stage B: Developing and refining alternatives and assessing effects.
- Stage C: Prepare the sustainability appraisal report.
- Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public.
- Stage E: Post adoption reporting and monitoring.

3.4 The National Planning Practice Guidance (paragraph 016 (Reference ID: 11-016-20190722) provides advice on baseline information and notes that this *“refers to the existing environmental, economic and social*

characteristics of the area likely to be affected by the plan, and their likely evolution without implementation of new policies. It provides the basis against which to assess the likely effects of alternative proposals in the draft plan.”

3.5 The National Planning Practice Guidance also provides advice on the relationship between neighbourhood plans and local plans. It notes that when brought into force, neighbourhood plans become part of the statutory development plan for the area that they cover. They can be developed before, after or in parallel with a local plan. Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body. Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals (Paragraph: 006 Reference ID: 61-006-20190723).

3.6 For a plan to be adopted it must pass an examination and be found to be ‘sound’. Paragraph 35 of the NPPF identifies that plans are ‘sound’ if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

3.7 Paragraph 59 of the NPPF says that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.

3.8 Paragraph 72 of the NPPF goes on to say that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.

4. THE ST ALBANS LOCAL PLAN SUSTAINABILITY APPRAISAL SCOPING

4.1 The new Local Plan and SA provide an opportunity to resolve the significant failures demonstrated within the previously submitted Local Plan and the Council's approach is expected to respond to this context.

4.2 As set out in Section 2, the relationship between plan-making and sustainability appraisal should be clear. The Council's approach to meeting housing need, Green Belt assessment (specifically in relation to small sites and their contribution to meeting housing need), and the assessment of potential allocations should be provided for through the appraisal process.

4.3 Chapter 2 of the SA sets out the plans, policies and programmes which are relevant to the new Local Plan, noting (paragraph 2.1) that these are

important to identify sustainability objectives, set the context for the SA and define the scope of the SA framework.

- 4.4 Neighbourhood Plans provide the statutory development plan at the most local of democratic levels. We are pleased to see Neighbourhood Plans included in the baseline plans identified for Population (Table 2.2) by the SA Scoping Report. Where draft or made Neighbourhood Plans exist, the Council should consider allocations, both draft and final, as part of the baseline scenario when progressing the SA and new Local Plan.
- 4.5 In noting that one neighbourhood plan has been made and a number are emerging the Scoping Report says that the SA should aim to “*Ensure community engagement and that NPs align with new Local Plan*”. Of course, neighbourhood plans may come forward before, in parallel or after a local plan but regardless, local planning authorities should take a proactive and positive approach in collaboration with Neighbourhood Groups and take neighbourhood plan policies and proposals into account when preparing the local plan (Paragraph: 006 Reference ID: 61-006-20190723).
- 4.6 The Redbourn Neighbourhood Plan 2017-2031 Pre-Submission (Regulation 14) Draft was published in November 2017. The plan recommended our clients’ site for release from the Green Belt and allocation for residential development through Policy RED7. The Inspectors explored the extent to which neighbourhood plans had been taken into account in developing the plan as part of their consideration of the Duty to Cooperate. As you will know, neither the development strategy, approach to Green Belt at Redbourn or aspirations of the Redbourn Neighbourhood Plan had been considered.
- 4.7 Progress on the Redbourn Neighbourhood Plan was halted pending the examination of the SADC Local Plan and will now advance in parallel with the new local plan review. In accordance with the PPG, we consider that the baseline position for the SA should signal taking account of Neighbourhood Plans being progressed within the District.

-
- 4.8 Notwithstanding the above, the SA will provide the framework for the Council to identify its own development strategy and site allocations, including the reasonable alternatives that need to be tested and the criteria for undertaking that appraisal. The SA provides the basis for considering ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives.
- 4.9 You will be aware that only strategic sites (a minimum of 500 dwelling or 14 hectares of developable land) were considered through the SA and plan-making process. This raised a number of concerns given that smaller sites of less than 500 dwellings were generally excluded from the Green Belt Review and subsequent site selection process. This approach resulted in the exclusion of smaller sites, including our clients' site, Land at Southeast edge of Redbourn (previously identified as SA-SS3). Despite making a limited or no contribution towards checking sprawl, preventing merging, safeguarding the countryside, preserving setting or maintaining local gap the site was excluded on the basis it did not meet the minimum 500 dwellings capacity criteria set by the Council.
- 4.10 The SA site assessment criteria will therefore be particularly important when considering site impacts, including any site threshold but also Green Belt matters. It should be sufficiently dynamic to take account of the impacts of development, including mitigation or where boundary changes potentially would not compromise the overall function of the Green Belt when assessed as part of a detailed survey.
- 4.11 The Council must now look to fully assess the opportunities for small sites to assist in meeting housing need and not rely on an outdated approach and pass or fail tests which result in no further analysis of potentially suitable small sites. This has the potential to resolve a number of the Inspectors' main concerns including the potential to meet the objectively assessed housing need, the existence of exceptional
-

circumstances to alter the Green Belt boundaries and the potential for meeting housing needs.

END

Our ref: Q100390
Your ref:
Email: [REDACTED]
Date: 8 March 2021



Spatial Planning Team
Civic Centre
St Peters Street
St Albans
AL1 3JE

By Email
planning.policy@stalbangov.uk

Dear Sir / Madam

Representations on the Sustainability Appraisal Scoping Report – Consultation Draft (January 2021)

On behalf of Pigeon Investment Management Ltd, which acts on behalf of Pigeon Hemel Hempstead Ltd, we are pleased to submit representations in response to the St Albans District Council (SADC) consultation on the Sustainability Appraisal Scoping Report (Consultation Draft) (January 2021).

Pigeon are the freehold owners of land north of Redbourn Road, Hemel Hempstead which forms the southern part of the land previously identified as the North Hemel Broad Location within Policy S6 (iv) of the SADC withdrawn draft 2018 Local Plan.

These representations have been prepared from a planning, rather than a detailed environmental perspective, to consider whether the Sustainability Appraisal Scoping Report (Consultation Draft), and its approach, seek to meet the tests that will be scrutinised through the Local Plan Examination. These tests are detailed at paragraph 35 of the NPPF which states that Plans are 'sound' if they are positively prepared, justified (taking into account reasonable alternatives), effective and consistent with national policy. The Sustainability Appraisal has a key role to play in demonstrating these tests are met.

Review of Sustainability Appraisal Scoping Report (Consultation Draft)

The Sustainability Appraisal Scoping Report (Consultation Draft) sets out the proposed Sustainability Appraisal Framework in Chapter 5 which will be used to test the new Local Plan against sustainability considerations, and the Framework incorporates 16 objectives and supplementary questions.

Paragraph 5.14 of the Sustainability Appraisal Scoping Report states that strategic policies and site allocations will be assessed against these 16 sustainability objectives. However, paragraph 18 of the NPPG is clear (as summarised below) that **all** reasonable alternatives of the plan should be considered, not just reasonable alternatives for strategic policies and site allocations. If all reasonable alternatives are not considered, there is a risk that the plan will not be found sound (paragraph 35 of the NPPF).

Paragraph 18 (Reference ID: 11-018-20140306) of the NPPG defines reasonable alternatives as:

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“the different realistic options considered by the plan-maker in developing the policies in the plan”

Paragraph 18 of the NPPG also states:

“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- *as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.”*

Therefore, the Sustainability Appraisal Scoping Report must appraise all components of the plan (and reasonable alternatives where they exist). To be clear, the SA should appraise the following:

- Vision and Objectives;
- Spatial Strategy (in respect of the quantum and distribution of development);
- Policies (including strategic policies and detailed development management policies); and
- Site Allocations (including strategic sites and smaller scale allocations).

Furthermore, the development and appraisal of proposals in local plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. Paragraph 5.15 of the Sustainability Appraisal Scoping Report sets out a form (table 5.4) indicating how local plan policies compliance with the 16 sustainability objectives will be assessed and recorded. However, it is not clear from table 5.4 how the consideration of reasonable alternatives will be fed back to the local plan development team.

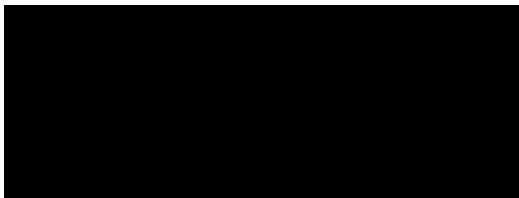


In order to ensure that the Local Plan is found to be sound, the Sustainability Appraisal Scoping Report needs to allow for a clear audit trail that will show how and why SADC has arrived at its decisions e.g. on its preferred approach and site allocations. The interim SA and final SA must include detailed explanations as to why reasonable alternatives have been rejected. We anticipate that the Council has these points firmly in mind already but there is a danger that the Appraisal could be applied as a tick-box exercise rather than truly getting to the heart of the key issues facing the plan – including the scale of growth, the relationship with and needs of adjacent districts, the appropriateness of alternative strategy options and the ability for requirements to be met outside the Green Belt. The Planning White Paper makes clear that assessments of this nature need to be strategic and meaningful and it would be helpful for the scope to be reviewed to ensure that this is its central purpose.

Overall, to ensure that the SA meets the tests that will be set through the Local Plan Examination, and therefore ensure that the Local Plan is found to be sound the SA must consider all reasonable alternatives for all components of the Local Plan (vision, spatial strategies, policies and site allocations) and the SA must include detailed explanations as to why reasonable alternatives have been rejected.

Should you require any further information, please do not hesitate to contact me, or my colleague John Rhodes.

Yours sincerely



██████████
Associate

cc. ██████████, Pigeon Investment Management

SADC Draft Scoping Report for Sustainability Appraisal

Response from Sandridge Parish Council

March 2021

General

The document is welcomed in that it sets out the process by which the Sustainability Appraisal (SA) will be carried out.

The parish council notes the state of flux that the planning process is currently in and that this may impact on any future SA. We also note the comments made on the potential impact of COVID-19 on the future work and travel patterns in the district.

A Glossary should be provided as part of the document. The use of unexplained acronyms hampers transparency.

The Indicators sometimes do not cover all aspects of the Objective/Supplementary Questions. There should be provision for ongoing review of these indicators and the inclusion of further measures suggested/becoming available wherever relevant to an Objective.

Strategic Environmental Assessment (SEA)

The inclusion of the SEA within the SA is supported. However, the SA has to consider social and economic impacts as well as environmental. The draft scoping report appears to be weighted towards consideration of environmental impacts. Specifically, the chapters have been structured by topic consistent with the format set out in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004. Those topics do not specifically cover social and economic impact, although those impacts are covered within the population and human health headings.

Paragraph 5.10 sets out the potential conflicts and should be given greater prominence in the document.

Chapter 1

Paragraph 1.8

To avoid confusion the phrase “that may have other effects on spatial planning in St Albans” should be amended to read “that may have other effects on spatial planning in the district”. This would then be consistent with references to the district elsewhere in the document.

Paragraph 1.11

There are several mentions in this document to the Watling Chase Community Forest, but the plan for that forest does not appear to have been updated since

2001. The Council should seek to work with the other parties involved to update the plan for the forest.

Paragraph 1.16

There is a reference to “local panning authority”, that should be “local planning authority”.

Paragraph 1.17

Two references to “TRL” with no explanation as to what TRL is.

Paragraph 1.22

Given the proposed structure of the SA, following the format set out in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004, the last sentence should be revised to read “all references to ‘SA’ in this document should be taken to mean ‘SA as produced to comply with the requirements of the SEA Directive.’

Other matters

The SA does not mention the Bromate Plume in Sandridge – page 39 of the document refers to water extraction, but does not mention the impact of the plume on that.

Chapter 2

Neighbourhood plans should be included more widely in the lists of documents to be reviewed as part of the SA.

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A specific indicator is needed for the kms of pedestrian or multi-user public rights of way/paths to capture whether this form of active travel is also increasing.

Use could be made of HCC traffic surveys. Measurement should not only be of car or passenger transport for getting to work purposes but more generally.

Consideration should be given to the use of the concept of 15 minutes neighbourhoods to assess new developments and improve existing neighbourhoods.

SO6 (ps 52, 56)

The supplementary question 'Site new development close to existing community infrastructure' **must** also include provision of additional community infrastructure as part of the development approval.

There should be a supplementary question 'encourage cooperation with Health partners and developers to ensure sufficient GP, primary and secondary care to maintain good health capacity for all changes in population?'

The indicators given are insufficient to measure the two supplementary questions.

SO7 (ps 52, 56)

Should there be an indicator which measures the quality of all agricultural land prior to development and takes this fully into account in any decision?

SO9 (ps 52,56)

There are numbers of existing areas in the district already subject to flooding during wet weather. These areas should be included as areas of flood risk – not just the Environment Agency's map. Use could be made of maps prepared by the county council.

SO10 (ps 52, 57)

'Good' air quality needs to be capable of measurement. The AQMAs only measure the very worst areas and are insufficient as a measure for 'good' or 'improved air quality. **The Objective should aim to improve air quality and to reduce harmful emissions.** The supplementary questions and measures should be more ambitious in sampling air quality across the district. As an example, HCC traffic surveys and measures of congestion at peak hour traffic could be used.

SO12 (ps 52, 57)

There are areas of heathland at both Nomansland Common and Colney Heath Common, which should also be considered when conducting the SA.

SO16 (ps 52, 59)

Surely a suitable supplementary question here is whether there is a 'made' neighbourhood plan in the area and what its provisions are?

Appendix A

Paragraph A0.1

In the sentence “This Appendix outlines sets out in more detail the baseline analysis carried out to support this Sustainability Appraisal” the word “outlines” should be deleted.

Paragraph A1.20

Butterfly World has ceased to operate and it is questionable whether the site should be included in this list. The country park at Ellenbrook has been established by the developer, but management of the park has yet to be transferred to a trust as set out in the relevant s.106 agreement. The sites listed all relate to initiatives within the last 30 years and the list does not include older sites such as various commons or Jersey Farm Woodland Park.

Paragraph A2.22

The opening of Katherine Warington school in Harpenden will have mitigated the shortage of secondary school places and more up to date information should be obtained.

Paragraph A2.24

There is no mention of the University of Hertfordshire.

Paragraph A2.41

This statement about the local bus network to St Albans city centre is complacent and arguably factually inaccurate. Mention should be made of successive cuts to the frequency and extent of bus services to suburbs, and particularly to the outlying villages over the last 10 years. Covid advice has produced artificially low bus usage over the last year but this should change as the pandemic becomes ‘managed’. Any bus usage figures from March 2020 until these are unaffected by COVID-19 prevention advice cannot be taken as representative.’

Paragraph A8.8

Westmill Landfill has reached capacity and if it has not already closed for Hertfordshire waste it will do shortly. There will then be no contracted disposal facilities in Hertfordshire.

March 2021

By email only: planning.policy@stalbans.gov.uk

Spatial Planning Team
St Albans and City District Council
Civic Centre
St Peters Street
St Albans
Hertfordshire
AL1 3JE

02 March 2021

Dear Sir/Madam

ST ALBANS NEW LOCAL PLAN 2020-2038 – SUSTAINABILITY APPRAISAL, LOCAL DEVELOPMENT SCHEME AND CALL FOR SITES

On behalf of our client, Stackbourne Ltd, we enclose representations in response to the recently published information and engagement supporting the new Local Plan 2020-2038. This letter specifically considers the Local Development Scheme and Sustainability Appraisal (SA) Scoping Report (both January 2021). A 'Call for Sites' exercise has also opened, to which a response has also been submitted.

Stackbourne Ltd is the freehold owner of Smallford Works, Smallford Lane, St Albans, AL4 0SA. The exact land ownership is enclosed at Appendix A. We also attach a completed HELAA submission form at Appendix B.

Background

Stackbourne Ltd has actively promoted Smallford Works for residential development in previous iterations of the plan-making process – including the recently withdrawn Local Plan 2020-2036.

Despite the Council's claims that the best use of previously developed land formed part of its Spatial Strategy at examination, the Smallford Works site was excluded from allocation due to an unfounded decision to focus predominantly on strategic sites capable of delivering approximately 500 dwellings and/or 14ha of developable land. This is something our client actively opposed during the examination.

In light of the above, an outline planning application (Ref: 5/2019/3022) was submitted in July 2019 for up to 100 dwellings on the site. However, this was refused in July 2020 by the Planning Referrals Committee upon recommendation of the Case Officer.

Our client has appealed this decision (Ref: APP/B1930/W/20/3260479) and a virtual inquiry is scheduled to take place from Tuesday 16th – Thursday 18th March 2021.

Local Development Scheme

An updated Local Development Scheme (LDS) was published in January 2021, setting out the timetable for the production of the Local Plan 2020-2038.

We welcome the Council's decision to conduct a new Green Belt assessment. As recognised by the Council's officers¹, the previous Green Belt assessment was produced in line with the 2012 version of the NPPF and as such, did not include particular references to giving *'first consideration to land which is previously-developed'* – something that was introduced to Paragraph 138 in the 2018 version and has been retained in the current 2019 version.

Whilst the LDS indicates that the Local Plan would be adopted by December 2023, this appears to contain some unrealistic assumptions in regard of timescales. For example, the Council assume that the process from submission to adoption of the Plan would take only 6 months. We are concerned that the Council will not meet this target, and as such, could be subject to Government intervention.

Sustainability Appraisal

Whilst we generally support the principle of the Sustainability Objectives (SOs) set out at Table 5.2 of the Scoping Report, we take the opportunity to explore, emphasise and evaluate three specific areas in which the Council must focus – particularly in light of the critique of the Inspector's at the Examination of the recently withdrawn Local Plan.

Housing Provision (including Affordable Housing)

Chapter 5 of the NPPF seeks to support the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed.

The baseline housing evidence at Appendix A of the Scoping Report emphasises both the extent and impact of insufficient housing delivery in St Albans over the last 20 years. As a direct result of not adequately planning for the homes they need, the Council are left with just 2.5 years five-year housing land supply (5YHLS). Further, and of particular relevance to a District that is amongst the most unaffordable outside of London, just 17.2% of the 2,182 completions in the last five years (2015/16 – 2019/20) have been affordable dwellings. This is also only significantly beneath the Council's own adopted target of 35%.

The Council are correct to identify a Local Housing Need (LHN) of 893 dpa for a plan period 2020-2038, in line with the recent revisions to the Standard Methodology.² In light of the above, it is imperative that the Council work proactively to address this long-standing issue.

It is in this context we raise concern with the language of the Council's inferred approach to meeting its housing requirements at Paragraph A8.4:

"The new Local Plan will therefore need to identify ways to limit new housing growth to the minimum possible and prioritise ways in which land can be released to protect best and most versatile land, land with mineral resource potential and land with ecological and landscape value".

Planning Practice Guidance (PPG) is clear that the Standard Methodology calculation provides a LHN that should be taken as a minimum figure.³ This assessment should be completed independently from assessing land availability, establishing a housing requirement figure, and preparing policies to address this (e.g. site allocations).⁴ An assessment of land availability is designed to identify a future supply of land which is suitable, available, and achievable over the plan-period – in the context of defined constraints.

¹ Printed Minutes of Planning Policy Committee Meeting on 9th June 2020 (pg. 3)

² Paragraph 004 (Reference ID: 2a-004-20201216)

³ Paragraph 002 (Reference ID: 2a-002-20190220)

⁴ Paragraph 001 (Reference ID: 2a-001-20190220)

Whilst it is important to recognise the conflict development has on other aspects, such as landscape/visual and environmental impact, we would expect the Council to take a clear, evidenced, and justified approach to the balance of these conflicts within the realms of national planning policy and its guidance. We suggest the wording of Paragraph A8.4 may indicate otherwise.

Previously Developed Land

SO14 sets an aim to “*prioritise locating new development on previously developed land first*”.

We fully agree with this approach, which supports Government has continuously emphasised the need of local planning authorities to prioritise the delivery, and maximise the potential, of PDL in advance of greenfield sites. This is set out in both White Papers⁵ and the Framework itself.⁶

Paragraph 137-138 particularly highlights PDL as a priority when proposing to amend Green Belt boundaries. As highlighted above, the previous Green Belt Assessment was not completed with reference to this consideration, and subsequently condemned in the Inspector’s post-hearings letter.⁷ Indeed, officers have confirmed that proposed development at Smallford Works itself is “*one of a small number of additional PDL sites [...] that may be approached differently*” under a new Green Belt Assessment.

We agree with this observation and consider that the delivery of Smallford Works for residential development would represent an efficient and appropriate use of previously developed land within the Green Belt, that would contribute to much needed market and affordable housing within the District.

Site Selection

The Inspectors were critical of the Council’s approach to site selection agreed at the May 2018 meeting of the Planning Policy Committee – namely by choosing to allocate 8 strategic sites within the parameters of providing a minimum of 500 dwellings or 14 hectares (ha) of developable land.⁸ As they state, minimal flexibility and an out-dated Green Belt Assessment disregarded multiple sites – including Smallford Works – from inclusion within the Plan, despite many warranting further investigations.

We would expect the Council to avoid such an arbitrary approach in the production of this Plan, and to use the SA to refine and guide a more suitable approach to site selection.

Conclusion

In summary, whilst we broadly support the objectives and aims set out in the SA, we have taken the opportunity to emphasise three key elements of the recently withdrawn Local Plan which the Council should seek to rectify in the production of the Local Plan 2020-2038.

We support the Council’s decision to undertake a new Green Belt assessment, to be produced in line with the most up-to-date requirements of the NPPF. However, we expect the Council to take a more detailed approach to its site selection, influenced by the key objectives of the SA – including the prioritisation of previously developed land. Most importantly, we urge the Council to work proactively to address a dire shortage of both market and affordable housing that has unearthed from decades of improper plan-making.

I trust the comments we provide are useful, but should you have any queries, please do not hesitate to contact me. I would appreciate if you would keep me informed as to the progression of the Local Plan 2020-2038, including any subsequent stages of consultation.

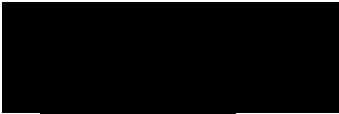
⁵ *Fixing our broken housing market* (February 2017) and *Planning for the Future* (August 2020)

⁶ See Paragraph 84, 117, 118, 119

⁷ Paragraph 48

⁸ See Paragraph 33-34 if the Inspectors Report

Yours sincerely,

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Partner

A long black rectangular redaction box covering contact information.

T: 



St Albans Local Plan Consultation Response

SA Scoping Report (Consultation Draft)

Taylor Wimpey Strategic Land

March 2021

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1. Introduction and Overview

- 1.1 This representation is made in response to the St Albans City and District Local Plan 2020 – 2038 Sustainability Appraisal Scoping Report Consultation Draft (January 2021) (SASR) by Strutt & Parker on behalf of Taylor Wimpey Strategic Land. The SASR has been published for consultation as part of the preparation of the new Local Plan by St Albans City and District Council (SACDC).
- 1.2 Taylor Wimpey Strategic Land (TWSL) has an interest in land within St Albans City and District, and is actively promoting the allocation of sites through the Local Plan process.
- 1.3 Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) requires SACDC to *inter alia* take steps to bring every consultation iteration of the Plan and accompanying Sustainability Appraisals (SA) to the attention of persons who may have an interest in the Plan; and invite such persons to express their opinion on these documents. On adoption of the new Local Plan, Regulation 16 requires SACDC to set out how they have taken into account opinions expressed through this consultation
- 1.4 As an organisation with an interest in development within St Albans City and District, TWSL welcome the opportunity to make representations on the SASR. We trust we will be consulted on future iterations of the Local Plan and accompanying SAs, and look forward to working positively with SACDC and other stakeholders in the preparation of the new Local Plan.
- 1.5 Our comments on the SASR are set out within this representation. We trust these are of assistance and should the Council have any questions relating to our comments we would be more than happy to discuss these further.

2. Other Relevant Plans, Programmes and Sustainability

- 2.1 The SASR rightly recognises at paragraph 2.1 the need to review other plans, policies and programmes to help inform the sustainability objectives of the new Local Plan.
- 2.2 We consider that the NPPF comprises policies which are of particular relevance in the preparation of Local Plans and their SAs, and that the SASR should reflect this.
- 2.3 We note that in considering relevant plans and programmes that are of relevance, the SASR suggests responses to the policies within the NPPF in relation to a number of topics. One of these is population.
- 2.4 Table 2.2 (b) of the SASR concerns the topic of population. It identifies the NPPF and PPG as providing relevant policies and guidance, and states that on this basis the SA should aim to:

“Promote sustainable transport and provide a wide choice of high quality homes”.

- 2.5 Whilst we agree that promoting sustainable transport and providing a wider choice of high quality homes should be objectives of the Local Plan and SA, we consider there are a number of additional key factors that also need to be recognised, all of which are important if sustainable development is to be achieved. The NPPF places great emphasis on the importance of boosting housing land supply, as well as other housing-related matters which go well beyond simply providing high quality homes. Such factors that we consider should be recognised within Table 2.2 (b) include:

- Provision of sufficient quality homes to meet the needs of existing and future residents, with sufficient flexibility to be able to respond to changing circumstances (NPPF paragraphs 11, 20, 59 and 60);
- Provision of homes to address the needs of the District as well as those of neighbouring areas where it is sustainable to do so (NPPF paragraphs 11 and 60);
- Provision of affordable homes to meet affordable housing needs (NPPF paragraphs 20 and 61)
- Provision of homes in appropriate locations in order to sustain the vitality of existing communities, including rural communities (NPPF paragraphs 59 and 78);

- Improve the affordability of housing within the District (PPG Paragraph: 006 Reference ID: 2a-006-20190220);
- Provision of housing of a size, type and tenure to meet the varying housing needs of different groups in the community, including specialist housing (NPPF paragraph 61)

2.6 We consider it is important for the SA to ensure that the above are addressed through the preparation of the new Local Plan. This will not only help to ensure that the Local Plan achieves sustainable development, but that it conforms to national policy and as such is capable of being found sound in this regard.

3. Baseline information

3.1 Chapter 3 of the SASR includes baseline information considered to be of relevance to a number of topics, including housing.

3.2 Datasets identified by the SASR relating to housing and listed in the Table 3.2 (b) include the following:

- Total households;
- Net housing completions;
- Statutory homelessness: eligible homeless people not in priority need per 1,000 households;
- Affordable housing completions;
- Gypsy and Traveller accommodation needs;
- Property prices;
- Self build housing register;
- Monthly rent for housing accommodation

3.3 We agree with inclusion of the above, but suggest that the following should also be added, or efforts made to identify such data if not already available to the Council:

- Housing affordability ratios
- Affordable housing need

4 Summary of Issues

4.1 Chapter 4 of the SASR summarises the issues identified from previous tasks undertaken in the preparation of the SASR.

4.2 In relation to those listed in Table 4.2 (issues identified for (b) population) we consider these need to reflect the comments we have made in Section 2 and Section 3 of this representation. We suggest these issues could be expressed and added to the existing list in Table 4.2 as follows:

- Ensure existing and future housing needs are met, including affordable and specialist housing, and by size, type and tenure;
- Ensure the vitality of existing communities, including rural communities, is sustained.
- Improve affordability of housing in the District.

5 SA Framework

5.1 Table 5.1 within Chapter 5 includes the proposed SA Objectives. SO3 is as follows:

“Provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations”

5.2 As in our comments in relation to the SASR’s relevant plans, programmes and policies; and in relation to the summary of issues it identifies, whilst we do not object to the above, we consider that, alone, it is insufficient to cover the multitude of other objectives that the new Local Plan is required to seek to achieve in relation to housing.

5.3 Additional objectives should be added to reflect the points set out at paragraph 2.5 of this representation.

5.4 Similarly, we consider that Table 5.2 is required to be amended / added to in order to ensure appropriate objectives are addressed through the SA Framework, reflecting the points made in this representation. The addition of such objectives will also help ensure the SA can differentiate between the social, economic and environmental impacts of various options, providing an assessment of them in relation to a greater range of criteria. This in turn will ensure the SA can assist decision-makers in the selection and rejection of options.

5.5 In addition, and looking at current proposed specific elements of the SA Framework as set out in Table 5.2, we wish to make the following specific suggestions.

5.6 In relation to SO2 and the proposed supplementary question:

“[Will the policy] maintain and support existing businesses and the vitality of the district centres”

We suggest this is amended as follows:

“Will the policy maintain and support existing businesses and the vitality of the district centres and its rural communities”

5.7 Alternatively, it may be considered more appropriate to have a separate supplementary question on vitality of rural communities.

5.8 In relation to SO3 and the proposed supplementary question:

“[Will the policy] meet evidenced housing needs”

We suggest this is amended having regard to the points made earlier in this representation:

“Will the policy meet evidenced current and future projected housing needs, including needs having regard to factors which may have suppressed projections, such as affordability?”

5.9 One of the supplementary questions in relation to SO3 is:

“Reflect the requirements of all sections of society in terms of location and affordability as well as adaptability for an ageing population”

5.10 Further to the reference to location of housing in the above, we suggest that one of the indicators should be location of housing by settlement, with a view to ensure that the sustainable growth of the District’s various settlements is supported.



thameswaterplanningpolicy@savills.com

Spatial Planning Team
St Albans District Council



0118 9520 509

Sent by email to: planning.policy@stalbans.gov.uk

8th March 2021

St Albans District Council – Call for Sites, Draft Statement of Community Involvement and Sustainability Appraisal Consultation

Dear Sir/Madam

Thank you for the opportunity for Thames Water Utilities Ltd. (Thames Water) to comment on the above document. As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments to make on the consultation documents.

Call for Sites

Thames Water own an operational sewage treatment works at Harpenden which lies close to the eastern edge of the settlement. The site is split into two parcels of land either side of Piggottshill Lane and is bounded to the south by residential development with further residential development located to the north of the site on the opposite side of a disused railway line. A golf course lies to the east of the site while a small parcel of land owned by St Albans District Council lies to the west of the site between Thames Waters land and the eastern boundary of the urban area of Harpenden.

The site is a developed site within the Green Belt. However, the site is not considered to perform well against the functions of the Green Belt set out in the NPPF. The preparation of the new Local Plan provides an opportunity to amend the boundaries of the Green Belt. The removal of the site from the Green Belt would reduce constraints to the delivery of essential infrastructure on the site or for redevelopment of any parts of the site which become surplus to operational requirements.

In relation to the performance against the purposes of including the land in the Green Belt, the removal of the site from the Green Belt would have a negligible impact on checking unrestricted sprawl of large built up areas as the site is an existing developed site covered with buildings, plant and machinery required in connection with the sewage treatment process. Similarly, given that the site is an existing developed site on the edge of the existing settlement, its inclusion in the Green Belt plays no appreciable role in preventing neighbouring towns from merging into one another; safeguarding the countryside from encroachment; or preserving the setting and special character of historic towns.

The fifth purpose of the Green Belt is to assist urban regeneration. Again the designation of Harpenden STW as Green Belt does not assist with this purpose. The designation as Green Belt acts as a constraint to development on the existing site which provides essential infrastructure. Removing the site from the Green Belt would assist with the delivery of any necessary upgrades to the site in the future. In addition, should upgrades or the relocation of the works result in the release of part or all of the site, there would be opportunities to regenerate the existing developed site for alternative development reducing development pressure on greenfield sites.

For the above reasons it is considered that the new Local Plan should review the existing Green Belt boundary and remove Harpenden Sewage Treatment Works from the Green Belt. A call for sites proforma has been completed for the site and is enclosed.

Statement of Community Involvement

New development could result in a requirement for upgrades to the existing sewerage network and existing sewage treatment works to ensure that no adverse impacts such as sewer flooding or pollution of land and watercourses. Thames Water cannot prevent the connection of new development to the sewerage network and as such are keen to work closely with the local authority and developers to ensure that any necessary upgrades are delivered alongside development.

In order to assist with the delivery of infrastructure upgrades Thames Water seek early engagement from developers to understand the scale, location and proposed timing of delivery. This can help with identifying when and where network upgrades will be required. Thames Water would welcome additional supporting text within the Statement of Community Involvement encouraging developers to engage with them prior to the submission of any planning applications.

We trust the above is satisfactory, but please do not hesitate to contact us if you have any queries.

Yours sincerely

Thames Water Utilities Limited

