

St Albans City and District Local Plan Examination

Stage 1 Matters, Issues and Questions

Introduction

Stage 1 of the hearing sessions will cover the matters set out below. If after the Stage 1 hearing sessions, we consider that in relation to these issues the Plan is likely to be capable of being found legally compliant and sound (having regard to the potential for us to recommend modifications), development management policies, will be considered at a later date. A further set of matters, issues and questions will be issued prior to those hearings.

<h4>Matter 1 – Legal/Procedural Requirements (Introduction)</h4>

Main Issue

Whether the Council has complied with the relevant procedural and legal requirements.

Questions

Plan preparation

1. Is the Plan compliant with:
 - (a) the Local Development Scheme?
 - (b) the Statement of Community Involvement?
 - (c) the 2004 Act and the 2012 Regulations?

Sustainability Appraisal

2. Are the likely environmental, social and economic effects of the Plan adequately and accurately assessed in the Sustainability Appraisal (SA)?
3. Does the SA test the Plan against all reasonable alternatives?
4. Have any concerns been raised about the SA?
5. Have the Council complied with the requirements of section 19(5) of the 2004 Act with regards to SA?
6. There is a Submission addendum to the SA Report dated March 2019. Has this been consulted on? If not, should it have been?

Habitat Regulations Assessment

7. Have the Council complied with the requirement of the Conservation of Habitats and Species Regulations 2017 with regards to Habitats Regulations Assessment (HRA)?

8. Has the assessment taken account of the EU Court of Justice Judgement (12 April 2018) and the updated PPG? Have any concerns been raised about the HRA and are there any outstanding concerns from Natural England?
9. Are the likely environmental, social and economic effects of the Plan adequately and accurately assessed in the HRA?
10. There is a HRA screening update March 2019. Has this been consulted on?

Other matters

11. Having regard to paragraphs 20-23 and 28 of the NPPF are there any policies in the strategic section of the Plan that should be in the non-strategic section?
12. Does the overarching strategy of the Plan secure the development and use of land which contributes to the mitigation of, and adaptation to, climate change consistent with S19(1A) of the Planning and Compulsory Purchase Act 2004? If so, which are the relevant policies?
13. How have issues of equality been addressed in the Plan?
14. Why is the Plan start date be in the future?
15. Do the revisions to the National Planning Practice Guidance (PPG) introduced in June and July 2019 (after the submission of the Plan) have any implications for any policies in the Plan?
16. Are there any 'made' Neighbourhood Plans or any being prepared or in the pipeline? If so, how have these been taken into account and where is this evident?
17. In light of the Council's response to the Inspectors' letter of 2 July 2019, please can a running list of draft Main Modifications be provided and put on the Examination website?

Matter 2 – The Duty to Co-operate
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Main Issue

Whether the Council has complied with the duty to cooperate in the preparation of the Plan.

Questions

General

1. What are the genuinely strategic matters as defined by S33A(4) of the Planning and Compulsory Purchase Act?

2. Should these be set out in the Plan?

Overall housing provision

3. Who has the Council engaged with in terms of overall housing provision and what form has this taken?
4. Are there issues of unmet need from within neighbouring authorities? If so how are these being addressed?
5. Have specific concerns been raised through duty to co-operate discussions or representations?
6. Does the overall housing provision being planned for in St Albans City and District area have any implications for other authorities? If so, what are they and how are these being addressed?
7. In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Plan? What has been the outcome of co-operation and how has this addressed the issue of housing provision?

Jobs growth and employment land provision

8. Who has the Council engaged with in terms of jobs growth and employment land provision and what form has this taken?
9. What are the inter-relationships with other authorities in terms of economic activity, travel to work and the market for employment land and premises?
10. How have these inter-relationships been taken into account in preparing the Plan in terms of jobs growth and employment land provision?
11. In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Plan? What has been the outcome of co-operation and how has this addressed the issue of jobs growth and employment land provision?

Transport infrastructure

12. What are the strategic matters and particular issues?
13. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
14. In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

Water resources/waste water

15. What are the strategic matters and particular issues?

16. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
17. In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

Flood risk

18. What are the strategic matters and particular issues?
19. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
20. In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

Other strategic matters

21. What are the other strategic matters and particular issues?
22. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
23. In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?
24. Has the funding for any essential infrastructure been secured? If not, why not and what are the implications for the delivery of the Plan?

Broad locations for development

25. Are there cross boundary issues in relation to any of the proposed site allocations such as transport or other infrastructure requirements? If so how have they been addressed through co-operation?

Matter 3 – The Spatial Strategy, Settlement Hierarchy and Development Strategy (Policies S1 and S2)

Main Issue

Whether the Spatial Strategy, Settlement Hierarchy and Development Strategy is justified, effective and consistent with national policy.

N.B. Detailed issues concerning the individual broad locations for development will be dealt with under Matters 6 and 7.

Questions

1. What is the basis for the overall spatial strategy and broad distribution of growth set out in policy S1? What options were considered and why was this chosen?
2. Is the growth in large villages consistent with their position in the settlement hierarchy set out in policy S1?
3. Has the settlement hierarchy taken account of facilities in neighbouring settlements, outside of the local authority's boundary? If not, should it?
4. Does the Plan clearly set out the approach to be taken to proposed development in the countryside? If not, should it?
5. Is there a need to define settlement boundaries?
6. Is the proposed development strategy set out in policy S2 appropriate and realistic?
7. Will this provide a sufficient mix of sites and provide the size, type and tenure of housing to meet the needs of different groups in the community? Does this reflect the evidence from a local housing needs assessment?
8. Should the Plan include some small and medium size sites in order to provide greater choice and flexibility and accord with NPPF paragraph 68?
9. Does this strategy rely on windfall housing and if so, is this made clear in the Plan and is it based on the advice in paragraph 70 of the NPPF?

<h3>Matter 4 – The Metropolitan Green Belt (Policy S3)</h3>
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Main Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall approach to the Green Belt.

Questions

1. What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? Is the Council's approach to the Green Belt set out in its response to the Inspector's Initial Question 16 and letter of the 2 July 2019 (Green Belt topic paper) robust and in line with national guidance?
2. How have the conclusions of the Green Belt Review informed the Local Plan? Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development, and prioritise sites which are previously developed and/or well served by public transport? Where is this evident?

3. Has a comprehensive assessment of capacity within built up areas been undertaken? Have all potential options on non-Green Belt land in the countryside been assessed?
4. Have opportunities to maximise capacity on non-Green Belt sites been taken (including increasing densities)?
5. Have discussions taken place with neighbouring authorities about whether they could accommodate some of the identified housing need?
6. Does the Plan seek compensatory improvements to the environmental quality and accessibility of the Green Belt?
7. Do the exceptional circumstances, as required by paragraph 136 of the Framework, exist to justify the plan's proposed removal of land from the Green Belt?
8. Are all the sites and their boundaries clearly shown on a map?
9. Is the approach to secondary school sites in the Green Belt justified?
10. Is the approach to transport infrastructure in the Green Belt justified?
11. Did the Council consider the designation of safeguarded land in the Plan, and should this be identified?

<p>Matter 5 – Objectively Assessed Needs for Housing and Employment Land (Policies S4 & S5)</p>
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Main Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for housing and employment land.

Questions

Housing

1. The identified housing need is based on the standard methodology in the National Planning Policy Framework. Is the Council's application of this in accordance with the methodology in the PPG (as updated)?
2. Are any starting point LHN adjustments necessary?
3. Is the housing target in the Plan appropriately aligned with forecasts for jobs growth?
4. Is the stepped trajectory in policy S4 and appendix 2 of the Plan appropriate and justified?

5. How much housing is anticipated after the plan period as a result of the proposals in the Local Plan?
6. Have the Council set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations, as set out in paragraph 65 of the NPPF?
7. Have the Council carried out an assessment, as required by S.8 of the housing act 1985, of the needs of people in the district residing in caravans or houseboats?

Gypsies and Travellers

8. Does Policy L7 accord with the guidance in Planning Policy for Traveller Sites (PPTS) and is it justified and effective?
9. The GTAA update 2019 identifies a need for 72 additional pitches for households that meet the definition in the PPTS. It also identifies a need for up to 5 additional pitches from undetermined households, and a need for 41 additional pitches for households that do not meet the planning definition. How are these to be provided for?
10. What site allocations are to be made for those who meet the definition (72 pitches)? Policy L7 refers to four 15 pitch sites in 3 of the Broad Locations only (total of 60). What about the shortfall of 12 pitches?
11. How are the needs of those 'undetermined households' that may meet the definition to be provided for?
12. How are the needs of those not meeting the definition to be provided for? Paragraph 1.12 of the GTAA suggests that the need for those households who did not meet the definition (41 pitches) will be addressed as part of general housing needs and through separate local plan policies (as required by paragraph 60 of the Framework). Where is this evident?
13. Bearing in mind the Council's stepped approach, is the plan consistent with the requirement of national policy to identify a supply of specific deliverable sites sufficient to provide at least five years' worth of supply against the local requirement and identify broad locations for growth for years 6 -10?
14. How were the 3 Broad Locations identified as being suitable for gypsy and traveller sites chosen? Why are they preferred to the other Broad Locations?
15. Do the proposed sites reflect the needs of travellers?
16. The East of Hemel Hempstead (Central) Broad Location is a proposed employment site. As such is GT provision here appropriate? What is the nature of the work that is underway to support the delivery of 30 pitches here?

17. How will the sites in the Broad Locations be achieved? (the policy suggests that locations will be identified, allocated and safeguarded through collaborative master planning under Policy S6). Is this approach costed and deliverable?
18. Are any other allocations intended? What consideration has been given to the expansion or intensification of existing sites referred to in the GTAA? Has the suitability of extending existing sites or those with temporary permissions been considered (criteria 3 and 4 of Policy L7)?

Employment Land

19. How has the Functional Economic Market Area (FEMA) been defined and is it appropriate?
20. What is the overall need for employment land that has been identified? What is the evidence for this? What is the situation regarding existing commitments and the residual need for additional land allocations? What is the past trend in take up rates for employment land?
21. Overall does the evidence base provide adequate justification for the jobs target set out in policy S5?
22. Does the jobs target align with those associated with the Hertfordshire Enviro-Tech Enterprise Zone?
23. Are the employment land requirements consistent with the housing requirement figure?
24. Does the plan allocate sufficient land to meet the identified minimum need in policy S5?
25. Does the land allocated provide sufficient choice and flexibility?
26. What are the inter-relationships with other authorities in terms of employment land provision and how have these been taken into account?

<p>Matter 6 – The Broad Locations for Development (Policy S6) – General Matters (Policy S6) and Strategic Infrastructure (Policies L17 and L18)</p>
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Main Issues

Whether the policies for the development and delivery of the Broad Locations for Development are justified, effective and consistent with national policy?

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for infrastructure needs of St Albans over the Plan period.

Whether it contains effective mechanisms to secure the provision of strategic infrastructure as and when it is needed.

Questions

1. How were the broad locations for development selected, and what evidence documents were produced to inform their selection?
2. Have landscape, agricultural land, flood-risk, natural heritage and heritage assessments been carried out to inform the locations of the proposed broad locations?
3. Is the Sustainability Appraisal of the options for the broad locations robust?
4. Are the locations of the proposed broad locations adequately identified on the policies map? Should they be more clearly defined?
5. What are the anticipated timescales for the proposed masterplans? What form will these take? Are they being progressed alongside the Local Plan?
6. Should the Broad Locations East and North of Hemel Hempstead be considered comprehensively as one broad location?
7. In allocating larger scale sites have the Council considered the advice in paragraphs 72 a-d of the NPPF? If so where can we find the evidence to support this?
8. What strategic infrastructure is necessary for the Plan to be implemented? Is this clearly set out in a policy/policies in the Plan? If not, should it be?
9. Have the infrastructure requirements of the broad locations and other strategic infrastructure been adequately identified and costed in an up to date IDP? Including the requirements for:
 - a) road improvements;
 - b) public transport systems and sustainable transport networks;
 - c) water supply and waste water treatment;
 - d) the provision of electricity/gas and other services;
 - e) primary healthcare;
 - f) schools and early years' provision;
 - g) green infrastructure; and
 - h) leisure and sports facilities.
10. Are any infrastructure requirements missing?
11. Are there known sources of funding, particularly for development expected to be delivered in the next 5-7 years of the Plan? Are these all in the Council's latest Infrastructure Delivery Plan?
12. Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?

13. Should policy S6 make more specific requirements as regards the provision and timing of the infrastructure needs for the proposed broad locations?
14. Are there effective mechanisms in place between the Council, other neighbouring authorities and infrastructure providers to co-ordinate the planning and provision of infrastructure?
15. Will the broad locations for development have any potential cross boundary transport impacts? How will these be addressed?
16. Is any of the strategic infrastructure reliant on other development coming forward in neighbouring authorities?
17. Will the delivery of key infrastructure allow for the delivery of planned development in line with the housing trajectory in the Plan? If not, what will be the shortcomings and how will the Council address these matters?
18. Are there any other constraints on the delivery of strategic infrastructure?
19. What are the implications of allocating the site of the approved Strategic Rail Freight Interchange at Park Street Garden Village for housing? Can an alternative site be provided? What are the wider cross boundary/national consequences of the Interchange not being delivered there?
20. In response to our initial question – *'Have the Council undertaken a whole plan viability assessment of the submitted Plan to ensure that the policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan? If so, can you direct us to it please?'* the Council replied *'Yes, the St Albans CIL and Viability Report Final Draft – November 2017 (INFR 009), submitted on Friday 26th March 2019, assessed the viability of the emerging Local Plan....The assessment included looking at the cumulative cost and impact of the proposed (and now in similar form final) draft Plan.'*

Has the economic viability of each of the proposed broad locations been adequately demonstrated in the St Albans CIL and Viability Report (Nov 17)? Is the study robust and does it demonstrate that the local Plan is viable and based on reasonable assumptions? In particular:

- a) Is it based on the publication version of the Plan or a previous draft?
- b) Has the viability assessment been carried out in accordance with the advice in the PPG and is it up to date?
- c) Are appropriate assumptions made about the level and timing of infrastructure costs and other costs associated based on the most up to date IDP?
- d) Is there a contingency allowance? If not, should one be included?
- e) Are appropriate assumptions made about the rate of output?
- f) Are appropriate assumptions made about the timing of land purchases?
- g) Is the viability threshold set at an appropriate level?

- h) Should an allowance have been made for inflation?
- i) Is an appropriate allowance made for finance costs?
- j) Is the residual value methodology appropriate?
- k) Has income from commercial floorspace been factored into the calculations?

Matter 7 – The Broad Locations for Development – Specific Matters (Policy S6 (i) to (xi))

Main Issue

Whether the detailed policy for each broad location for development is justified, effective and consistent with national policy.

Questions

East Hemel Hempstead (North) S6 (i)

(A major urban extension of Hemel Hempstead in association with Dacorum Borough Council)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that this broad location is capable of delivering 1,650 homes?
3. What is the justification for the care home/flexi care/special needs accommodation required?
4. What is the justification for the 3% self-build figure?
5. What consideration has been given to the effect of the proposed allocation on the Nickey Line footpath/cycleway? What mitigation measures are anticipated? Should they be specified in the Plan?
6. Is the proposed site capacity appropriate taking account of constraints including the provision of infrastructure including the buffer zones and mitigations to address the Buncefield Oil Depot and pipelines? Has the Health and Safety Executive been consulted?
7. What arrangements have been made for joint working between the Council and Dacorum Borough Council to deliver the proposed broad location?
8. What are the timescales and funding sources for the necessary improvements to junction 8 of the M1?
9. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

10. Have the implications of the site's location in relation to the Luton Airport flight path been considered?
11. Should the policy refer specifically to the provision of sports facilities?
12. How have heritage assets been considered and is a Heritage Impact Assessment required?
13. Is the approach to the new primary and secondary school on the site (in relation to the Green Belt) justified?

East Hemel Hempstead (Central) S6 (ii)

(A major new enviro-tech focussed employment location, including enhanced transport infrastructure for new and existing employment and residential areas in collaboration with Dacorum Borough Council)

1. Is the site suitable for the development proposed and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the proposed broad location is suitable for enviro-tech employment uses and capable of providing 10,000 jobs?
3. What arrangements have been made for joint working between the Council and Dacorum Borough Council to deliver the proposed broad location?
4. Is the proposed site capacity appropriate taking account of constraints including the provision of infrastructure including the buffer zones and mitigations to address the Buncefield Oil Depot and pipelines? Has the Health and Safety Executive been consulted?
5. What are the timescales and funding sources for the necessary improvements to junction 8 of the M1 and the link road? Are these required for other development? Are any other road improvements required and what mechanisms are in place for their delivery?
6. Have the impacts of the proposal on the wider road network been considered?
7. What is the justification for the Multi-Modal Transport Interchange and how will this work in practice? Has it been costed and how will it be delivered?
8. How have heritage assets been considered and is a Heritage Impact Assessment required?
9. Should the plan identify specific allocations/areas for employment uses within the broad location?

10. What is the justification for the 15 pitch gypsy and traveller site within this broad location? Should a specific location be identified? Have the implications of the nearby commercial developments in terms of noise and disturbance been taken into account?
11. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

East Hemel Hempstead (South) S6 (iii)

(A major urban extension of Hemel Hempstead)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the proposed broad location is capable of delivering 2,400 dwellings? (200 of which are after the plan period)
3. What arrangements have been made for joint working between the Council and Dacorum Borough Council to deliver the proposed broad location?
4. Should the policy refer specifically to the provision of sports facilities?
5. What are the timescales and funding sources for the necessary improvements to junction 8 of the M1?
6. What is the justification for the 3% self-build figure?
7. Should the specific location for the primary school within the site be identified?
8. How have heritage assets been considered and is a Heritage Impact Assessment required?
9. What is the justification for the 15 pitch Gypsy and Traveller site here? Should its precise location be identified?

North Hemel Hempstead (iv)

(A major urban extension of Hemel Hempstead)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the proposed broad location is capable of delivering 1,500 dwellings? (1000 of which are beyond the plan period).
3. What arrangements have been made for joint working between the Council and Dacorum Borough Council to deliver the proposed broad

location?

4. Should the policy refer specifically to the provision of sports facilities?
5. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?
6. What are the timescales and funding sources for the necessary improvements to junction 8 of the M1?
7. Is the proposed site capacity appropriate taking account of constraints including the provision of infrastructure including the buffer zones and mitigations to address the Buncefield Oil Depot and pipelines? Has the Health and Safety Executive been consulted?
8. Have the implications of the site's location in relation to the Luton Airport flight path been considered?
9. Should the specific location for the primary school within the site be identified?
10. How have heritage assets been considered and is a Heritage Impact Assessment required?
11. What is the justification for the 3% self-build figure?

East St Albans S6 (v)

(An urban extension of St Albans, improved and new education and training facilities and to further integrate Oaklands College with the wider community)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the proposed broad location is capable of delivering 1,250 dwellings?
3. Is the approach to the new primary and secondary school on the site (in relation to the Green Belt) justified?
4. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?
5. How have heritage assets been considered and is a Heritage Impact Assessment required?
6. Has consideration been given to air quality and any mitigation measures?
7. What is the justification for the investment in Oaklands College?
8. What is the evidence to support the provision of a hydrotherapy pool?

9. Is the site suitable for development in relation to flood risk?

North St Albans S6 (vi)

(An urban extension of St Albans)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the proposed broad location is capable of delivering 1,100 dwellings?
3. What is the justification for providing 10 essential local worker houses for local teachers in this location?
4. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?
5. Should the specific location for the primary school within the site be identified?
6. Should the policy refer specifically to the provision of sports facilities?
7. Has consideration been given to the linking of the ecological corridors including Heartwood, Batchwood, and Beech Bottom Dyke?
8. Has consideration been given to air quality and any mitigation measures?
9. How have heritage assets been considered and is a Heritage Impact Assessment required?
10. Has regard been had to the potential for mineral extraction in this broad location?

North East Harpenden Broad Location S6 (vii)

(An urban extension of Harpenden)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the proposed broad location is capable of delivering 760 dwellings?
3. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?
4. Should the policy refer specifically to the provision of sports facilities?
5. How have heritage assets been considered and is a Heritage Impact Assessment required?
6. Is the site suitable for development in relation to flood risk?

7. Has consideration been given to air quality and any mitigation measures?
8. Should specific provision be made for a new neighbourhood centre?

North West Harpenden S6 (viii)

(An urban extension of Harpenden)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the proposed broad location is capable of delivering 580 dwellings?
3. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?
4. Should specific provision be made for a new neighbourhood centre?
5. Should the policy refer specifically to the provision of sports facilities?
6. How have heritage assets been considered and is a Heritage Impact Assessment required?
7. Is the site suitable for development in relation to flood risk?

West of London Colney S6 (ix)

(An urban expansion of London Colney and a new secondary school to enhance the sustainability of London Colney)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the proposed broad location is capable of delivering 440 dwellings?
3. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?
4. What is the justification for a new secondary school and how would it enhance the sustainability of London Colney as a small town?
5. Is the approach to the 'all-through' school on the site (in relation to the Green Belt) justified?
6. Should the policy refer specifically to the provision of sports facilities?
7. How have heritage assets been considered and is a Heritage Impact Assessment required?
8. Has consideration been given to air quality and any mitigation measures?

9. Is the site suitable for development in relation to flood risk?
10. Has regard been had to the potential for mineral extraction in this broad location?

West of Chiswell Green S6 (x)

(An urban extension of Chiswell Green)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What evidence is there to demonstrate that the broad location is capable of delivering 365 dwellings?
3. Should the specific location for the primary school within the site be identified?
4. What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?
5. Should the policy refer specifically to the provision of sports facilities?
6. Has consideration been given to air quality and any mitigation measures?
7. How have heritage assets been considered and is a Heritage Impact Assessment required?

Park Street Garden Village S6 (xi)

(A new garden village to help deliver changes to the services on the Abbey Railway Line and provide a new secondary school)

1. Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
2. What are the implications of providing a new garden village on the site of an approved Strategic Rail Freight Interchange and how have these been dealt with?
3. What evidence is there to demonstrate that the garden village is capable of delivering 2,300 dwellings (including 600 beyond the plan period)?
4. What further infrastructure work (including technical and environmental studies) needs to be undertaken, and is this appropriate to be left to the masterplanning stage?
5. What is the justification for the substantial new Country Park and have its financial implications been considered?
6. Does the Abbey Railway Line have capacity to support the proposal?

7. What evidence is there to demonstrate that services would be increased?
Can rail operators provide the increased peak period service sought?
8. Is the passing loop on the Abbey Railway line justified and deliverable?
9. What is the likelihood of the direct rail services to Euston via Watford (or future extension to Metropolitan line to Watford) or an additional station on the Midland Mainline?
10. Should the policy refer specifically to the provision of sports facilities?
8. Is the site suitable for development in relation to flood risk?
9. Is the approach to the primary and secondary schools on the site (in relation to the Green Belt) justified? Should their locations be identified?
10. How have heritage assets been considered and is a Heritage Impact Assessment required?
11. Has consideration been given to air quality and any mitigation measures?
12. What is the justification for the two 15 pitch Gypsy and Traveller sites here? Should their precise locations be identified?

Matter 8 – The Supply and Delivery of Housing Land

Issue

Whether the approach towards the supply and delivery of housing land is justified and effective and consistent with national planning policy.

Questions

1. What is the estimated total supply of new housing in the plan period and how does this compare with the planned level of provision?
2. What is the estimated total supply in the plan period from:
 - a) Existing planning permissions?
 - b) Other commitments e.g. sites subject to S106 agreements?
 - c) Proposed site allocations?
 - d) Other sources?
3. Can the Council please provide a graph to show the housing trajectory and also a clearer, simpler table than that in appendix 2 of the Plan.
4. Is the housing trajectory realistic?
5. The majority of the proposed housing will be provided on a small number of large sites. Does the Council have a contingency Plan should one or all of these sites not deliver as expected?

6. Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 73 of the NPPF?
7. What are the implications of stepped delivery of housing on the supply and delivery of housing?
8. What impact will this have on the 5 year supply of deliverable housing land and the delivery of affordable housing?
9. On the basis of the Plan as submitted, is it realistic that it would provide for:
 - a) A supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption?
 - b) A supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?

If you contend that the Plan would not provide for either (a) or (b) above (or both) could it be appropriately modified to address this?
10. In overall terms would the Plan realistically deliver the number of dwellings required over the plan period?
11. How have site densities been determined? How rigid are these figures?
12. What are the targets for the provision of affordable housing? What has been achieved in recent years?
13. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?
14. Is there sufficient variety in terms of the location and type of sites allocated?