

## **Housing and Economic Land Availability Assessment (HELAA) – Draft Outputs**

### **LPAG 18th January 2022 - Response to Member Questions**

#### IMPORTANT INFORMATION – PLEASE READ

The Housing and Economic Land Availability Assessment (HELAA) is a technical study prepared to inform the Council's new Local Plan. The assessment and identification of sites has no status in formally allocating land for future development and does not guide any decision that the Council makes on individual planning applications. The purpose of the HELAA is to consider a wide range of potential options for the future supply of housing and employment land. It does this through assessing sites with future development potential. It is not a statement of policy and does not allocate sites to be developed. This is the role of the Local Plan.

Far more sites with the potential for housing are identified than will be needed for the Local Plan. Identification through the HELAA as having potential for housing does not mean that housing should come forward on these sites, as in many instances there will be strong planning reasons why they should not. The identification of potential development sites within the HELAA as deliverable does not oblige or mean that the Council will grant planning permission for development. All planning applications will continue to be considered against the appropriate policies in St Albans City and District Council Local Plan and the National Planning Policy Framework (NPPF) and any other material considerations. The inclusion of potential housing sites within the study does not preclude them from being developed for other purposes.

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#### Minutes of 18 January

*The Chair asked Members for questions or comments on the "Housing and Economic Land Availability Assessment (HELAA)" report. Members queried whether the scale of land put forward and the Potential Housing / Employment / Other Use as set out on pages 60-61 correlated.*

*The Spatial Planning Manager and the Spatial Planning and Design Team Leader undertook to and review the figures and respond to Members once the review had been undertaken.*

[2] For Review: Action Tracker, LPAG dated 1<sup>st</sup> March 2022

#### Minutes of 1<sup>st</sup> March

*The Spatial Planning Manager apologised for it not being added to the Action Tracker and confirmed that it had been followed up on. Officers have identified a small number of cases where the land put forward, for which landowners or developers had identified areas for other uses, had been taken off the total area before the 60-40 residential split was applied. This had resulted in lower capacities being reported in the draft HELAA. There were also a couple of instances where land areas put forward included wider areas where residential development was not proposed, so the overall capacity was lower than might first appear, based purely on site area.*

The Planning Policy team apologies for the delay in responding to these queries raised by Members at LPAG. Investigating the matters has provided the opportunity for officers to re-examine the information and calculations used to prepare HELAA, and in some cases to make some improvements and updates.

Work in the Planning Policy team has now moved on to carrying out a Site Selection process that takes the information held in the HELAA and the emerging Urban Capacity Study and carries out a rigorous examination of the site suitability to enable SADC to meet its growth needs. The Site Selection work will in many respects supersede the HELAA, however it is still important that the information contained in the HELAA is accurate.

### **Queries raised**

LPAG Members raised two main queries on the HELAA Report, largely in relation the maps at section 5.4 page 58, and Appendix 1, Table 1:

1. Further explanation sought of the 'Other Uses' category and the reason for significant land take of this category on some sites.
2. Further clarification on the potential housing figures that appear lower than the sites shown on the maps might suggest, for example in Redbourn Ward.

### **'Other Uses' Category**

Following the outcome of the 'Call for Sites' 2021, a number of sites came forward for 'Other Uses'. Other Uses either form part of sites that have been promoted for residential or employment uses, or in some cases have been put forward for a single 'other use'.

An estimation of the use area is included when this information has been provided by the agent/landowner. There are also some larger sites where there are non-specific proposals that include 'Other Uses' where the use area has not been specified. For example green spaces, biodiversity uses, solar farms and community uses have been identified as a potential use in a significant number of sites submissions as part of large residential led mixed use sites.

Three examples below provide an illustration of how 'Other Uses' can constitute part or all of a site:

Redbourn	R-09-21	Land North East of Redbourn	Total Site Area 43.21ha	The site promoter stated that just under half of the site (approx 20ha) to be returned to wild meadows and wetland providing a space for recreation, education and ecological enhancement.
Wheathampstead	WH-05-21	Land at Blackbridge off Codicote Road	Total Site Area 57.93ha	The promoter seeks to establish the entire site under the concept of developing a 'country park' as an outdoor recreational location, including the provision of

				walking, cycling, trim-trails, horse riding and bridle paths.
St Albans	RF-01k-21	SRFI: Land in and Around Former Aerodrome Site, North Orbital Road (Parcel 4)	Total Site Area 33.69ha	The site is promoted for wildlife habitat enhancement and managed grassland.

Across the District the 'Other Uses' totals to 610 ha. The split down of this by parish can be seen in Appendix 1 below.

### **Housing Figures**

The questions raised by Members with relation to the apparent discrepancy between the extensive site areas showing on the maps and potential quantum of housing can be understood through considering three factors.

Firstly it should be noted that there are overlaps between parishes for several large sites. For example, while Redbourn site R-02-16 lies largely within Redbourn, it is not included in the total for Redbourn because this location is included under St Michael/ Redbourn site SMR-01-21 Land at East Hemel. The housing figure shown on Table 1 of the 18 January LPAG Report for St Michael / Redbourn is comprised entirely of the 4,050 units at site SMR-01-21. Therefore the total for 'wider Redbourn' has three elements – Redbourn; Redbourn/Harpenden Rural ; and Redbourn/St Michael = 4,505 + 1,565 + 4,050 = a total for what might be termed 'wider Redbourn' = 10,120.

Secondly, some of the sites have low or no housing figures because they are comprised partly or entirely of Other Uses or Employment uses, as discussed above.

Thirdly, in many cases the sites have uses other than housing, but where the submission does not specify this in terms of land area this cannot be classified under 'Other Uses'. This is the case, for example, with site SMR-01-21 Land at East Hemel (417ha), as in addition to the 4,050 units of housing there is 55ha of employment land, along with unquantified requirements of land for improvements to the M1 junction, a Country Park, Green Belt compensatory land, tree planning, biodiversity improvement, education, retail, leisure and community uses. The overall effect of the unquantified land requirements is that there is far more land showing on the maps than is actually being brought forward for housing or other specified uses.

While the factors set out above explain the very large majority of the apparent discrepancy between the extent of land put forward and potential housing numbers, as a result of the Members queries the Planning Policy team did review the application of the methodology to the sites and found that in a small number of cases an amendment should be made, as set out below (7 of 678 sites updated).

## Calculation Amendments

To take into account allowances for infrastructure on larger sites (over 2 Hectares), the HELAA Methodology sets out that 60% of the site will be considered usable for residential, with 40% required to provide infrastructure, main roads, open space and public facilities. The thresholds for site areas and associated gross to net ratios are as follows:

Site Area (hectares)	Gross to net ratio	Proposed density (dwellings per hectare)
Sites up to 0.4ha	100%	40
Sites between 0.4 to 2ha	85%	40
Sites greater than 2ha	60%	40

For the majority of sites in the District, this calculation was applied to the overall site figure, discounting constraints such as flood risk, as many of the proposed uses are essentially solely for residential use, with associated infrastructure and amenity land.

Some large sites proposed a mix of uses alongside residential, including types of infrastructure required for residential, but did not specify in their representation whether they should be included in the 40%. These were not included in the initial site area subject to the 60/40 split to calculate residential capacity.

On a small number of large sites, where there are multiple uses, it is acknowledged that this has resulted in an underestimation of the residential capacity.

For example, these are how dwelling capacity was calculated for R-09-21 - Land North East of Redbourn.

Actual site area after constraints deducted = (41.42 ha - 1.47 (flood zones) 20.3 (other uses) = 19.65 ha)

Estimated dwelling capacity = 19.65 ha x (60/40 (gross to net ratio)/100 x 40 (proposed density)) = 475 rounded up to nearest 5

The previous site calculations where this has happened were reviewed, and this has resulted in revisions to sites including Land North East of Redbourn. In this instance the capacity changed from 475 to 770. These changes are set out in Appendix 2.

There are also sites where, although a larger landholding has been submitted, it is clear that a smaller area is proposed for residential development.

Overall the residential capacity in Redbourn Parish changes from 4,210 to 4,505 dwellings (or for what might be termed 'wider Redbourn' 10,120).

These updates to the draft HELAA will be incorporated into the wider update to the HELAA that will be undertaken in coming months. This includes updates to the Urban Capacity Study after land availability questionnaires have been sent to landowners.

### Appendix 1 - 'Other Uses' by Parish

Parish	Number of Sites coded under "Proposed Use"	Other Uses: area (in hectares)
<b>Colney Heath</b>	<b>6</b>	<b>54.16</b>
Country Park	1	33
Gypsy & Travellers	2	2.1
Open Space, Wetland Park, Woodlands	2	19.06
Solar Farm	1	Not specified
<b>Harpenden Town</b>	<b>1</b>	<b>2.5</b>
Education: 2FE Primary School, Biodiversity Improvement, Green Belt Compensatory Land, Tree Planting	1	2.5
<b>London Colney</b>	<b>4</b>	<b>80.63</b>
Education: 2FE Primary School, Local Centre, Public Open Space, Green Space	1	13.96
Education: 6-8 FE Secondary School, 2FE Primary School, Public Open Space, Country Park	1	35.09
Wildlife Habitat Enhancement, Managed Grassland	1	4.2
Wildlife Habitat Enhancement, Managed Grassland	1	27.38
<b>Redbourn</b>	<b>5</b>	<b>20.57</b>
Biodiversity Improvement; Tree Planting	1	Not specified
Education	1	Not specified
Education, Local Services, Public Open Space	1	20.3
Education: Primary School; Local Centre; Open Space	1	0.27
Gypsy & Traveller, Biodiversity Improvement	1	Not specified
<b>Sandridge</b>	<b>4</b>	<b>12.8</b>
Community Centre	1	Not specified
Education: 2FE Primary School, Public Open Space, Neighbourhood Centre, Commercial, Recreation	1	Not specified
Education: Primary School, Commercial, Leisure	1	Not specified
Playing Pitches	1	12.8
<b>St Albans (unparished)</b>	<b>9</b>	<b>59.88</b>

Cemetery, Biodiversity Improvement	1	Not specified
Commercial	1	0.12
Education: 2FE Primary School; Biodiversity Improvement, Green Belt Compensatory land, Tree Planting	1	4.8
Education: Primary School; Neighbourhood Centre	1	Not specified
Primary School	1	2.45
Theatre	1	0.32
Wildlife Habitat Enhancement, Managed Grassland	3	52.19
<b>St Michael</b>	<b>1</b>	<b>Not specified</b>
Public Open Space	1	Not specified
<b>St Michael - Redbourn</b>	<b>1</b>	<b>Not specified</b>
Education: Secondary School, 2x Primary Schools, Nursery; Commercial, Community Facility and Health	1	<b>Not specified</b>
<b>St Michael - St Albans</b>	<b>1</b>	<b>Not specified</b>
Education: Primary School, Community Facilities, Open Space	1	Not specified
<b>St Stephen</b>	<b>15</b>	<b>311.14</b>
Church, Community Facilities	1	Not specified
Community Facilities, Biodiversity Improvements	1	Not specified
Community Use	1	5.85
Gypsy & Traveller, Education, Healthcare, Retail, Local Centre	1	Not specified
Leisure Facilities: Hotel, Gym, Pool, Retail, Biodiversity Offsetting, Green Belt Compensatory, Tree Planting	1	Not specified
Primary School; Local Centre, Medical Centre	1	Not specified
Road user Services, Hotel and Community Uses	1	3.07
Managed Grassland, Visitor Information Centre	1	119.56
Wildlife Habitat Enhancement, Managed Grassland	1	27.09
Wildlife Habitat Enhancement, Managed Grassland, Biodiversity Enhancement, Watercourse Vegetation	1	22.62
Wildlife Habitat Enhancement, Managed Grassland, Recreation Space	1	14.87

Wildlife Habitat Enhancement, Managed Grassland	3	40.88
Wildlife Habitat Enhancement, Managed Grassland, Recreation Space	1	77.2
<b>Wheathampstead</b>	<b>5</b>	<b>68.05</b>
Agricultural Practicing	1	4.31
Biodiversity Improvements, Green Belt Compensatory Land, Tree Planting, Open Space	1	4.2
Neighbourhood Centre, Leisure Facilities: Gym, Pool; Public Open Space	1	Not specified
Solar Farm	1	1.61
Visitors Centre, Leisure, Sports Facilities, Playing Pitches, Open Space, Woodland, Bike Trails	1	57.93
<b>Total</b>	<b>52</b>	<b>609.73</b>

**Appendix 2 – Recalculation of Capacity for Sites Where Previous Error Identified**

HELAA REF	Site Address	Parish	Area In Hectares	Proposed Land Use	Previous Residential Area in Hectares	New Residential Area in Hectares	Previous HELAA Housing Figures	New Housing Figure	Change	Comments
CH-14-21	Land at Colney Heath (Tarmac)	Colney Heath	43.54	Housing, Employment (uses not specified), Country Park	32.1	0.78	770	30	-740	<p>Country Park now indicated as 'Other Use'.</p> <p>Area 1 of Promoter site map is Employment, Area 2 (only 0.78 hectares) is proposed as Residential.</p> <p>11.33 hectares in flood zones and has been deducted from site area.</p> <p>0.2 hectares in neighbouring authority, and has been deducted from site area.</p> <p>Residential Land area now only 0.78 Hectares so 85% residential split. Based on representation, figure now close to that proposed by promotor</p>



HELAA REF	Site Address	Parish	Area In Hectares	Proposed Land Use	Previous Residential Area in Hectares	New Residential Area in Hectares	Previous HELAA Housing Figures	New Housing Figure	Change	Comments
HT-07-21	Land at North West Harpenden	Harpenden Town	27.43	Housing, Education: 2FE Primary School, Biodiversity Improvement, Green Belt Compensatory Land, Tree Planting	27.44	24.94	280	600	320	Previous figure of 280 possible typo (probably intended to be 580). Updated with new calculation as 600.
LC-01-21	Land South of London Colney	London Colney	32.99	Housing, Education: 2FE Primary School, Local Centre, Public Open Space, Green Space	17.47	28.88	420	695	275	Open Space, Green Space added to gross residential area. Overall figure updated.  0.29 hectares in a flood zone and has been removed from site figure.  1.27 hectares overlap of neighbouring authorities and has been removed from site figure.

HELAA REF	Site Address	Parish	Area In Hectares	Proposed Land Use	Previous Residential Area in Hectares	New Residential Area in Hectares	Previous HELAA Housing Figures	New Housing Figure	Change	Comments
LC-02-21	Land west of London Colney	London Colney	86.40	Housing, Education: 6-8 FE Secondary School, 2FE Primary School, Public Open Space, Country Park	41.83	61.01	1,005	1,465	460	Updated to include Country Park, Green Belt Compensatory Land, open Space in gross Residential area.  9.48 Flood Zone has been removed from site area.
R-09-21	Land North East of Redbourn	Redbourn	41.42	Housing: Market, Retirement; Employment (uses not specified), Education, Local Services, Public Open Space	19.65	31.95	475	770	295	Added public open space to gross residential area. Figure updated.  1.47 hectares are located with a flood zone and has been removed from the site area.

HELAA REF	Site Address	Parish	Area In Hectares	Proposed Land Use	Previous Residential Area in Hectares	New Residential Area in Hectares	Previous HELAA Housing Figures	New Housing Figure	Change	Comments
SA-16-21	Land West of Batchwood	St Albans (unparished)	8.95	Housing: Market, Self-Build; Education: 2FE Primary School; Biodiversity Improvement, Green Belt Compensatory land, Tree Planting	4.15	6.55	100	160	60	Added Biodiversity Offsetting, Tree Planting to gross residential area. Figure updated.
WH-25-21	Land west of Lamer Lane	Wheathampstead	7.32	Housing, Biodiversity Improvements, Green Belt Compensatory Land, Tree Planting, Open Space	3.12	7.32	75	180	105	Added public open space to gross residential area. Figure updated.