

ST ALBANS CITY AND DISTRICT LOCAL PLAN EXAMINATION

MATTER 3:

THE SPATIAL STRATEGY, SETTLEMENT HIERARCHY AND DEVELOPMENT STRATEGY (POLICIES S1 AND S2)

**ON BEHALF OF: BLOOR HOMES AND THE DEPARTMENT OF HEALTH
AND SOCIAL CARE**

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INTRODUCTION

Pegasus is instructed by Bloor Homes and the Department of Health and Social Care to submit a Statement in respect of Matter 3, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 4
- Matter 5
- Matter 6
- Matter 7
- Matter 8

Pegasus previously submitted representations in response to the Reg 19 Publication Plan in October 2018 and the Draft Issues and Options and Call for Sites in February 2018. The Hearing Statements should be read alongside our representations and supporting evidence.

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3. MATTER 3 – THE SPATIAL STRATEGY, SETTLEMENT HIERARCHY AND DEVELOPMENT STRATEGY (POLICIES S1 AND S2)

3.1 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?

3.1.1 It is considered that this question is particularly addressed to the Council for them to justify their strategy. In the submitted Plan it was not clear what the basis was for the overall spatial strategy and the broad distribution of growth.

3.1.2 Since then at the Inspectors request paragraph numbers and text justifying the policies have been included. However, whilst this quotes national guidance there is very little justification for the approach taken. No background papers or topic papers have been produced to support the Submission version of the Plan.

3.1.3 Pegasus have objected to the spatial strategy and distribution of growth set in Policy S1 since the Plan proposes Park Street Garden Village in category 2. There is no justification or evidence to support the inclusion of the Garden Village. The Plan in this respect is not justified or consistent with national policy as exceptional circumstances have not been justified to support the inclusion of the Park Street Garden Village. As mentioned in our response to Matter 1 it is considered that not all reasonable alternatives have been considered and that the SA is flawed and the Plan is therefore unsound.

3.2 Is the growth in large villages consistent with their position in the settlement hierarchy set out in policy S1?

3.2.1 Pegasus have no comments on this question.

3.3 Has the settlement hierarchy taken account of facilities in neighbouring settlements, outside of the local authority's boundary? If not, should it?

3.3.1 There appears to have been no discussion of cross boundary issues that have influenced the formulation of the strategy.

3.3.2 Whilst there is a record of meetings taking place between St Albans and the neighbouring Councils in 2018, there is no mention in the Plan of cross boundary issues and how these would affect the settlement hierarchy in the

Plan. The same sentence appears in each of the notes of the meeting (CD 028):

“SADC is under pressure from the Government intervention process to progress its Plan in accordance with its LDS. The approach in the context of joint working is to prepare a Plan which meets full need and then undertake future review in the context of SWH joint working and the proposed Joint Strategic Plan (JSP).”

3.3.3 Whilst the relationship with London is referred to and acknowledged as a significant spatial relationship as the city strongly influences local patterns of employment, travel, retail, leisure and migration; it does not appear to have influenced the spatial strategy.

3.3.4 Likewise the Plan recognises that the district has strong spatial relationships with neighbouring towns and that these towns offer alternative, complementary and sometimes competing employment, retail and leisure opportunities. EMP South West Herts Economic Study Update - Final Report by Hatch Regeneris (September 2019) refers to cross boundary issues and that FEMA shares strong relationships with other areas which could exert a growing influence on economic and labour market trends in South West Herts. This is not reflected in the strategy. For example, page ii of the Executive Summary states:

“Given the high level of housing growth planned for South West Herts and continuing affordability challenges in London, it seems likely that the strong immigration and out-commuting flows between the FEMA and the capital will continue to grow. The loss of employment floor space in London also presents opportunities for South West Herts to attract jobs and businesses. Although this would be dependent on South West Herts authorities first addressing their own undersupply.”

3.3.5 However, there is no reference to unmet needs of neighbouring authorities and any reference to joint working on cross boundary issues is in a future context in terms of the South West Hertfordshire JSP.

3.3.6 In the notes of the meeting with Hertsmere BC on 19th July 2018 reference is made to cross boundary issues including the potential Harperbury Hospital area. The permitted and currently under construction development at Harper Lane, adjacent to the Harperbury Hospital was discussed. *“HBC and SADC*

agreed that early co-operation was required for cross boundary issues.”
However, there is no other reference in the evidence base or the Plan.

3.3.7 Pegasus has promoted an extension to the Harperbury Hospital site in our representations to the Reg 19 St Albans LP and also in response to the early consultations on the Hertsmere Local Plan Review, as the site crosses the district boundary site. A significant amount of evidence has been provided to both Councils including an assessment of the site in terms of the sustainability objectives used by St Albans and also for Hertsmere. The site is an omission site and is well placed to meet the needs arising in St Albans and Hertsmere.

3.3.8 It is considered that there should have been a thorough discussion about the strategic matters and cross boundary issues, particularly as the previous St Albans Local Plan failed the Duty to Cooperate, these issues appear to be being deferred until the South West Hertfordshire JSP is being prepared.

3.4 Does the Plan clearly set out the approach to be taken to proposed development in the countryside? If not, should it?

3.4.1 This is not a matter we have commented on. However, it is not clear what the Council’s approach is to development in the countryside.

3.5 Is there a need to define settlement boundaries?

3.5.1 This is a matter we have not commented on.

3.6 Is the proposed development strategy set out in policy S2 appropriate and realistic?

3.6.1 ED25 F now provides the justification for the strategy in paragraphs S2.1 – S2.3 and reference is then made to a number of documents, some of which are considered to be out of date, especially when regard is had to the PINS Procedure Guidance for Local Plan examinations (June 2019) at paragraph 1.11:

Evidence base documents, especially those relating to development needs and land availability, that date from two

or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. As a minimum, any such documents should be updated as necessary to incorporate the most recent available information.

- 3.6.2 As the Plan is based on the standard method, it is not necessary to refer to the SHMA of January 2016 for the evidence to determine the housing requirement. Reference is also made to a Community Strategy of 2009 "Shaping our District Together for 2021" and a Development Economic Study May 2010.
- 3.6.3 Pegasus have objected to Policy S2 and the proposed Park Street Garden Village as a Category 2 settlement. It is not justified by the evidence and undermines the national interest as the site has permission for a Strategic Rail Freight Interchange granted by the Secretary of State following a lengthy process in which the Council objected to the proposal. It is considered that the strategy as proposed in the Plan is unsound as it "over-rides" the Secretary of State's decision. PSGV cannot be justified, neither is it considered to be effective or consistent with national policy.
- 3.6.4 It is considered that no exceptional circumstances exist to support the proposed Park Street Garden Village.
- 3.6.5 Pegasus object to the Council's methodology for Strategic Site Selection and evaluation and also that only sites that could contribute in excess of 500 dwellings were considered. Planning Policy Committee of 13th March 2018 at paragraph 4.2 states that:
- "This evaluation will be of potential strategic scale sites only. These are sites capable of accommodating residential development of a minimum of circa 500 dwellings or 14 Hectares of developable land."**
- 3.6.6 Paragraph 4.3 states that: *"For the Strategic Sites, site area and indicative site capacity will be calculated and recorded for all such sites. This will generally be on the basis of the method set out in the Council's Green Belt Review (GBR) (60% of the available land area assumed to be available for residential development. Net residential density on this area calculated on the basis of 40 dwellings per hectare)."*
- 3.6.7 The evaluation covers responses to 2018 'Call for sites' and previous Strategic Housing Land Availability Assessment submissions.

3.6.8 However, based on the Council's assessment of indicative capacity and an assessment of the site in terms of the purposes of the Green Belt; sites have either been carried forward for further assessment or rejected. The Stage 1 assessment states: *"To achieve 'further consideration for development' the site must be evaluated as lower or medium impact (Green or Amber). Any Red rating (higher impact) will rule a site out for further consideration."* This is a "policy on" assessment.

3.6.9 Table 1 of the 13th Mach Planning Policy Committee assesses the land at the former Radlett Aerodrome (now proposed as the Park Street Garden Village), reference number 52 in the Table and site reference PS-607, it is assessed as "Amber" in terms of the Green Belt Evaluation whereas Land South of Harper Lane (number 66 in the table) site reference LC-622 is assessed as "Red" in terms of the Green Belt evaluation.

3.6.10 It is not clear how this judgment has been made using the Green Belt Review Annex 1 (November 2013) as the former Radlett Aerodrome (now proposed as the Park Street Garden Village) i.e. Green Belt Parcel 30 makes a significant contribution to the purposes of the Green Belt.

"Significant contribution towards safeguarding the countryside, preserving the setting of Sopwell and St Albans, and maintaining the existing settlement pattern (providing gaps between St Albans and Park Street / Frogmore). Partial contribution towards preventing merging. Overall the parcel contributes significantly to 3 of the 5 purposes."

3.6.11 Whereas land at Harper Green is within Green Belt Parcel 31, although it contributes significantly to the Green Belt, overall the parcel contributes to only 1 of the purposes of the Green Belt, yet it was scored "Red" in Table 1 of the Council's assessment attached to the Planning Policy Committee Papers of 22nd May, 2018

"Significant contribution towards maintaining the existing settlement pattern (providing the gaps between London Colney, Park Street / Frogmore and Radlett Road). Partial contribution towards safeguarding the countryside and preserving the setting of Napsbury Park and London Colney. Overall the parcel contributes significantly towards 1 of the 5 Green Belt purposes."

3.6.12 Pegasus object to the Council's assessment of land at Harper Green adjacent to Harpersbury hospital. The evidence base does not support the Council's

- assessment or the inclusion of the land at the Radlett aerodrome /SRFI site for a Garden Village. Furthermore, as referred to in our objections to Policy S6 xi the Secretary of State's decision on the SRFI was particular to the SRFI being in the national interest.
- 3.6.13 It appears from the 13th March 2018 Planning Policy Committee Table 1 that Harper Green Garden Village was dismissed not only because it is located in the Green Belt, but also because the Council's assessment of capacity was such that they concluded that less than 500 dwellings could be accommodated in St Albans District as the site straddles the boundary with Hertsmere.
- 3.6.14 However, there are Broad Locations proposed in the Plan which have a threshold of below 500 dwellings (Policy S6ix and Policy S6x).
- 3.6.15 It is widely acknowledged that the scale of growth cannot be delivered sustainably by individual local authorities working in isolation. Consequently, neighbouring authorities are increasingly being encouraged to work together in order to provide homes, jobs and infrastructure. Indeed, we support such an approach in South West Hertfordshire. The benefits are widely acknowledged as it provides a more effective way of place shaping, by providing a bigger canvas to direct development to the right areas, which can be supported by the "right" infrastructure. Land at Harper Green is a sustainable alternative to the proposed Park Street Garden village. It is also well placed to meet housing needs of both St Albans and Hertsmere and should therefore be included as an allocation in the St Albans Plan.
- 3.6.16 Pegasus object to the Council's conclusion that the "exceptional circumstances" required for Green Belt release for development only exist in the Broad Locations set out in Policy S6. Pegasus have submitted evidence to promote an alternative site immediate adjacent to and enclosing Harperbury Hospital which already has permission for 206 dwellings.
- 3.7 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?**

3.7.1 This is a matter for the Council, the reliance of, in the main upon the Broad Locations, which will according to the trajectory at Appendix 2, not start to deliver until 2022/23 is a concern; particularly when the Council have also proposed a stepped approach.

3.7.2 Overall the strategy relies on a limited number of very large sites, which will not come forward until they are removed from the Green Belt through the Local Plan. There is a risk that this strategy will fail to meet housing needs in a timely manner, and that delays to the delivery of much needed housing (including affordable housing) will be the consequence.

3.8 Should the Plan include some small and medium size sites in order to provide greater choice and flexibility and accord with NPPF paragraph 68?

3.8.1 Pegasus consider that the Plan should include a range and choice of sites in addition to the strategic locations. Such an approach accords with the NPPF and since the Plan proposes a stepped trajectory, these sites will make an important contribution to housing supply, when the Broad Locations will take longer to come forward. In an area which is experiencing significantly higher median house price to median earnings when compared to elsewhere in the East of England and England; a range of choice of sites that can be delivered in the short term (noting that the Council cannot demonstrate a 5 year housing land supply) is critical to meeting housing needs.

3.9 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?

3.9.1 There is only one reference to windfalls in the Plan, at paragraph L8.1 in ED 25F. Windfalls are included in the Housing Trajectory Appendix 2. The Housing Trajectory states that from 2021/22 there is an allowance of 105 dwellings per annum until the end of the plan period. Initially this forms a significant part of the housing supply until the Broad Locations/allocations start to deliver.

- 3.9.2 It is not clear what the evidence is for the windfall figure of 105 dwellings per annum. Paragraph 70 of the NPPF states that where an allowance is to be made for windfall sites as part of anticipated supply, (which is the case in SADC), then there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.