

**Representations to the St Albans City and District Local Plan 2020-2036
Examination
Matter 3 – The Spatial Strategy, Settlement Hierarchy and Development
Strategy (Policies S1 and S2)**

Hill Residential Ltd (1158064)

12 December 2019



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

- 1.1 On behalf of Hill Residential Ltd (Hill) the following information is provided in regard to Matter 3 – The Spatial Strategy, Settlement Hierarchy and Development Strategy (policies S1 and S2).
- 1.2 Hill has an option over 1.5 ha of land owned by the Lawes Agricultural Trust (LAT) at Townsend Lane Harpenden, within the Rothamsted estate. Hill has fully engaged with the St Albans City and District Council's (SADC) draft Local Plan (DLP) process and submitted representations to previous consultations, including the Call for Sites, Regulation 18 and Regulation 19 draft iterations of the DLP. Representations have also been made previously to the Harpenden Neighbourhood Plan.
- 1.3 The site (1.5ha) has the potential to deliver approximately 50 new homes with access off Townsend Lane. The development of this site would not extend the settlement westwards beyond its existing extremity so will not impact upon the purposes of the Green Belt in this location with respect to sprawl or the merging of neighbouring towns. The land does not contribute to preserving the setting and special character of historic towns. Given the level of demand and need for new homes in the area, the land does not need to remain in the Green Belt in order to assist in urban regeneration.
- 1.4 The previous representation to all the aforementioned consultations includes technical appendices, which should be read in conjunction with the Regulation 19 Consultation representation submitted in October 2018 as well as this Hearing Statement.

Main issue

- 1.5 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.

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?

- 1.6 Harpenden is rightly identified as a *Main urban settlement* given the range of facilities and services within the settlement.

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

- 1.7 No. The strategy fails to direct sufficient development to Harpenden, a Tier 1 settlement, and instead allocates significant development at Chiswell Green and at Park Street. In particular the scale of growth at Park Street is not consistent within the strategy set out in S1. Locations on the edge of Harpenden would provide a sustainable option for meeting growth needs and are considered to have a minimal impact on Green Belt purposes.

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

1.8 No comment.

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

1.9 No comment.

5. Is there a need to define settlement boundaries?

1.10 Given the Green Belt context in SADC, the definition of settlement boundaries assists with the separation of settlements and contributes towards the purposes of the Green Belt (NPPF, paragraph 134). When defining the settlement boundaries through the Plan process, the DLP should use this opportunity to rationalise and amend the settlement boundaries to identify small and medium sized site (10 – 75 units) opportunities in sustainable locations, currently classified as being outside of the historic settlement boundary, which could be released from the Green Belt without significant detriment to Green Belt purposes. This would help contribute towards meeting housing requirements within the earlier part of the Plan period.

1.11 In line with NPPF paragraphs 138 and 139, the DLP must also look ahead and safeguard land beyond this Plan period and utilise the opportunity presented by this DLP to review Green Belt boundaries and amend settlement boundaries appropriately. This would seek to allocate sites in sustainable locations for a range of sizes, to assist in broadening the reliance on large strategic sites and promote growth at the most sustainable locations within the settlement hierarchy.

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

1.12 This strategy, currently outlined by draft policy S2, principally relies on the delivery of significant levels of growth on strategic allocations, at 'Broad Locations' only. This is considered to be a high risk strategy and an overreliance for a significant proportion of housing supply in SADC. Strategic, large scale sites are often in multiple land ownerships and can take a number of years to deliver, with risks of delay at each stage from pre-application and Masterplanning, through to securing approval for detailed Reserved Matters and discharging conditions, all prior to commencement of development. Securing appropriate mitigation measures and provision of required infrastructure add further levels of complexity to large sites (particularly with involvement from multiple landowners or stakeholders). This process can be lengthy and as evidenced within SADC's housing trajectory will lead to the delivery of such sites towards the latter parts of the Plan period. Annex 1 sets out the time line of various strategic scale projects delivered in recent years in the East of England, demonstrating how long it takes to deliver new homes.

1.13 From experience, a lead-in period of two years, on the grant of planning permission and a build out rate of 50 new homes a year (per housebuilder on site) are considered to be reasonable assumptions to apply across strategic sites with planning permission. The inclusion of up to 180 new homes per year on a number of the broad locations seems optimistic with little evidence of how many

housebuilders will be active on the sites in order to fulfil such ambitious targets. These broad locations with over optimistic trajectories include:

- East Hemel Hempstead (north): Policy S6i,
- East Hemel Hempstead (south): Policy S6iii and
- Park Street Garden Village: Policy S6xi.

- 1.14 Notwithstanding the overly optimistic trajectory, to reduce the reliance and pressure on the successful delivery of the 'Broad Locations', the DLP and policy S2 should promote the allocation of small and medium sized sites (1 - 75 units) on sustainably located sites, adjoining the settlement boundary of Category 1 settlements, including Harpenden. Not only would this deliver more development in the most sustainable locations, it would have a lesser impact on Green Belt purposes, would assist in meeting the housing need within the early part of the Plan period and will ensure local character is respected and enhanced.
- 1.15 Draft Policy S2 is not consistent with Policy S1, nor the objective of achieving sustainable development as it allocates land at settlements lower down the hierarchy than Harpenden. In the absence of a detailed review of Green Belt boundaries, it is not possible to conclude whether there is land on the edge of Harpenden which could be developed with a lesser impact on Green Belt and ensure consistency with the plan's strategy. Without such a detailed review it is also not possible to conclude whether or not land is included within the Green Belt which it is "necessary to keep permanently open." As established in Calverton, without such an assessment, it is not possible to conclude that exceptional circumstances exist to release the broad locations.
- 1.16 Draft policy S2 highlights that the allocations of 'Broad Locations' minimise adverse impacts on the purposes of the Metropolitan Green Belt. This statement is considered to be unjustified with the lack of robust evidence base (namely the lack of an effective and up-to-date Green Belt Assessment). Small-medium sites on the edge of settlements are likely to have less of an impact on the 5 purposes of the Green Belt. A finer grain assessment and potential contribution of smaller sites has not been satisfactorily considered throughout the plan-making process. As established in Calverton, a review is needed which considers whether the harm to the Green Belt has been minimised. Without a finer grain assessment, it is not possible to reach such a conclusion.
- 1.17 It is acknowledged that the DLP utilises a 20% buffer for previous under delivery, however, as currently proposed, the housing trajectory heavily relies on large strategic sites, which are not considered able to assist in meeting the housing targets until the middle to later parts of the Plan period. Therefore, there is no clear evidence within the currently proposed strategy to suggest that SADC will be able to meet the housing need target within the 5 year housing period, with or without the 20% buffer. SADC need to do more to allocate more available and sustainably located small and medium infill Green Belt sites in order to contribute towards meeting the housing targets in the early part of the Plan period, to assist in meeting the historic shortfall at the earliest opportunity.
- 1.18 It is considered that this strategy (as it is currently drafted) is not appropriate or realistic and therefore cannot be found sound. Instead, the strategy should include a range, including a number of small and medium scale sites in sustainable locations to assist with delivery of homes within the early part of the Plan period alongside

the larger strategic allocations (comprising the Broad Locations), which will deliver housing at a slower rate initially. This in turn will help relieve the pressure on the need for immediate delivery of the strategic, large sites.

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?

- 1.19 The development strategy should allocate a broader range of sites rather than the heavy reliance on the development of the Broad Locations, which would limit new housing stock to only a few large sites. Offering greater diversity of sites and locations will expand the number of developers operating within SADC, provide greater choice of homes to meet the needs of the community and provide a more resilient strategy for housing delivery.
- 1.20 Through the allocation of a sufficient mix of sites ranging in size, small and medium scale sites in a multitude of locations will be able to contribute towards meeting the needs of different groups of the community throughout SADC within the early part of the Plan period. This will relieve the pressure on the large strategic sites, which are unlikely to deliver homes until the latter part of the Plan period.
- 1.21 Notwithstanding the above, the late delivery of homes within the Plan period will also have an effect on the affordability of new homes within SADC. The reliance on such large, strategic developments subjects SADC's housing land supply to an increased level of risk. Such large sites can face complex issues, which can delay delivery. Outside of the Broad Locations, there are only 40 new homes allocated within the Plan. This places great pressure on the broad locations to not only deliver housing, but also deliver housing within the Plan period.
- 1.22 SADC is the most expensive District to live in the UK, outside of London. Medium quartile house prices stood at £540,000 in 2018, whilst the ratio of house prices to income stood at 16.81 to 1, ranking 14th most unaffordable lower tier local authority area out of 348 in England & Wales. Lower quartile house prices stood at £390,000, whilst the ratio of house prices to incomes stood at 17.68 to 1, 13th most unaffordable lower tier local authority area in England & Wales. As a result, it is a challenge for prospective buyers, also for Rothamsted Research to attract and retain staff and meet the needs of different groups of the community. The development of Land at Townsend Lane would deliver much-needed housing for the local community.

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?

- 1.23 Yes. In accordance with paragraph 68 the Plan should recognise the important contribution that small/medium sized sites can make. SADC should allocate a range of small to medium sites (10 – 75 units) to ensure delivery of a range of sites to provide a greater choice and flexibility throughout the Plan period. The use of sites, between 10 and 75 units, in sustainable locations for development will also help protect other more sensitive sites which contribute more highly to the purposes of the Green Belt. This would help to ensure that the 5 principles of the Green Belt are protected as far as possible, with smaller adjustments required to existing boundaries, and will assist in creating a greater choice and flexibility. Before the Plan can be found sound, further work is required to consider the provision of smaller, sustainable sites .

- 1.24 As currently drafted the Plan's draft strategy for the delivery of housing, on large strategic sites, is not considered to be sound as this approach conflicts with National Planning Policy, specifically paragraphs 68 and 72 of the NPPF. The allocation and promotion of small and medium scale sites (10 – 75 units) and the use of an up-to-date, finer grain Green Belt Review will assist in ensuring the strategy is in line with the aforementioned specific paragraphs of the NPPF and thereby ensuring that Plan is found sound.

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?

- 1.25 The Plan clearly relies on windfalls to achieve its housing needs, including within the early part of the Plan period. The windfall allowance is not justified and appears to include considerable double counting. In the past, sites coming forward in the form of office conversions, garages sites, SHLAA sites would all have formed part of the windfall element. To separate those out and still include a windfall element appears to be double counting.
- 1.26 In terms of potential windfall sites, policies L7, L12, L20, L22 and L26 all prevent sites in uses such as employment, retail, community /leisure uses, parking and green spaces from being developed. As such it is difficult to see where any windfalls will come from.
- 1.27 It is unclear how the "unanticipated delay factor" results in more homes being delivered from 2023/24.

Word count: 2,150

Annex 1: achieved planning timelines for strategic schemes										
Site	Local Planning Authority	Lead Developer	Date of Adopted Local Plan	Homes	Submission of application	Committee resolution	Decision notice issued	start on site	occupation of first homes	Submission to first occupations
Darwin Green	Cambridge City	David Wilson Homes	2006	1593	Dec-07	Jul-10	Dec-13	Aug-17	Dec-18	11 years
North West Cambridge	Cambridge City & South Cambs	Cambridge University	2009	3000	Sep-11	Aug-12	Feb-13	late 13	Jul-17	5.10 years
Clay Farm, Cambridge	Cambridge	Countryside	2006	2300	Jul-07	May-08	Aug-10	Oct-11	Mar-13	5.75 years
Trumpington Meadows	Cambridge City & South Cambs	Grosvenor/Barratt	2006/7	1200	Dec-07	Jun-08	Oct-09	Nov-11	Dec-12	5 years
Northstowe	South Cambs	Gallagher	2007	1500	Dec-07	Oct-12	Apr-14	Apr-15	May-17	9.5 years
North West Bury St Edmunds	St Edmundsbury	Countryside	2010	1070	Jul-13	Jan-14	Oct-14	Apr-16	June-2018	5 years
South east Bury St Edmunds	St Edmundsbury	Pigeon	2010	1200	Dec-15	Jan-17	not yet issued	Tbc	Tbc	In excess of 6 years
North East Haverhill	St Edmundsbury	Hallam	2010	2500	Oct-15	tbc	August 2018	Tbc	Tbc	In excess of six years
North West Haverhill	St Edmundsbury	NWH consortium	2006	1150	Sep-09	Feb-14	Mar-15	Tbc	Tbc	In excess of 10 years