

Matter 3: Spatial Strategy, Settlement Hierarchy and Development Strategy

STATEMENT ON BEHALF OF CP HOLDINGS LTD (ID 1158145)

- 1.1 WYG is responding to the Inspector's questions raised under Matter 3 – Spatial Strategy, Settlement Hierarchy and Development Strategy.
- 1.2 WYG is representing CP Holdings Ltd, who is the owner of a large site adjacent to the boundary of the St Albans built up area. The site corresponds to a southern section of Green Belt Assessment Site GB24B – as per the site plan appended to this statement. Roads and development form a hard boundary on every side. The total site area available ultimately is approximately 137ha but it is capable of being apportioned into phased smaller to medium sized sites. It is easily accessible to local facilities (Abbey Avenue local parade 400m away; Waitrose 1km away; Prae Wood Primary School 800m away). The site is presently in the Green Belt but is capable of providing a suitable and sustainable location for housing, helping to meet the housing need in the short to medium term.
- 1.3 This Hearing Statement builds on earlier representations submitted on the Regulation 19 version of the Local Plan.
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?
- 1.4 We support the thrust of Policy S1, which seeks to concentrate development around the higher order settlements (Category 1). However, the creation of Park Street Garden Village as a new Category 2 settlement is not supported. The site is in a highly unsustainable location to the south of the administrative area of St Albans and would be a 'standalone' development far away from the services and transport links. This does not fit into the definition of a Category 2 settlement.
- 1.5 We note that the site is currently within the Green Belt, and while it benefits from extant planning permission for a Strategic Rail Freight Interchange (SFRI), the appeal decision demonstrates that it was only made acceptable by the host of benefits that outweighed the impact to the Green Belt. However, a SFRI is a very different type of development to residential-led development and therefore does not demonstrate that it would have the same or no lesser impact on the Green Belt. There is no certainty at all that this site would be considered suitable for housing. Its inclusion as a new settlement is therefore inappropriate.

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

- 1.6 There is a clear opportunity in this Local Plan to additionally meet some of the unmet needs of neighbouring authorities. Consideration of this is a requirement of the NPPF, paragraphs 11 and 60. The NPPF does go on to provide examples of situations where such needs may reasonably not be met in full, including the protection of assets of particular importance and significant adverse impacts that would demonstrably outweigh benefits. However, the Council have provided no justifiable evidence as to why Green Belt policies prevent them from meeting some or all of this unmet need and are therefore not compliant with the NPPF.
- 1.7 The Council has chosen a strategy which focuses on fewer, large strategic sites for growth. The Sustainability Appraisal looked four 'Delivery Strategy Options', with a focus on strategic Green Belt release sites, smaller Green Belt release sites, and a mix of these options. In relation to Option 1 b) described as 'Mixed location/ scale development with smaller, but more, sites', the assessment concludes that *"This would necessitate more work on detailed Green Belt Boundaries to see what might be appropriate as smaller scale alternatives in some selected locations"* (p.36). Option 1 b) is discounted. There is little by way of further explanation for this. Appendix E8 states that the options involving smaller sites for development would bring *"fewer opportunities for major benefits to arise either from within the developments themselves or across the wider communities"*, although it does also state that these options would have less impact on the natural environment. No further assessment of these various benefits and disadvantages is provided. Using this approach, the Council have gone on to focus on the strategic infrastructure 'benefits' of larger sites without a balancing assessment of the negative impacts these could bring in addition to the more sustainable development that could result from smaller site development, or the phased development of larger sites closer to existing infrastructure.
- 1.8 The Council's reliance on large sites to deliver housing places a significant burden on these sites. Bringing forward such sites is often complex and reliant on the parallel or advanced delivery of required infrastructure and services. Any delays to the delivery of these sites will threaten the housing land supply in the future and significantly reduce housing numbers in the later years of the plan, where the stepped delivery requires an increasing level of delivery. The Council's identified housing land supply only just meets the required targets, with a minimal 221 unit buffer across the plan period. The average size of the strategic housing sites is 1,200 units – more than the annual target for later years of the trajectory. Failure to deliver or significant delays to any one of these would therefore totally undermine the Council's housing trajectory.
- 1.9 The proposed strategic housing development at Park Street Garden Village in particular creates considerable uncertainty for housing delivery. As set out above in answer to Question 1, the allocation of the site for housing, while it has planning permission for a strategic rail freight

interchange, is dubious. The uncertainty surrounding this allocation must be dealt with, as it accounts for over 15% of all housing delivery in this Local Plan.

- 1.10 The Council's approach has built in no flexibility in the event that one or more of the strategic sites is not delivered. We therefore recommend that the Council seek to identify more small and medium sized sites that can help to improve the likelihood that housing delivery actually come forward to meet the targets. A greater buffer beyond the required targets would also help to improve the flexibility of this strategy and provide greater certainty of meeting needs within necessary timescales.
 - 1.11 The Council has accepted that identification of suitable sites in the Green Belt will be required to meet housing targets. The sites identified for release should include a greater number of small and medium sized sites. Such sites should be located on the edge of sustainable settlements, so that they are not so reliant on the delivery of major infrastructure, but can utilise existing facilities, that may be modestly expanded. The most sustainable settlements are Category 1 settlements such as St Albans, which have a broad range of facilities, services and transport options. Identifying suitable small and medium sites adjacent to these Category 1 settlements should therefore be a priority.
 - 1.12 The Council's strategy set out in Policy S2 is therefore not effective to meet needs, nor is it justified as required by the NPPF. The over-reliance on large strategic sites is not a realistic strategy for meeting housing needs. The Council should conduct a review of Green Belt sites to identify small and medium sized sites that can delivery sustainable development in appropriate locations.
3. 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?
- 1.13 At present, development is focussed on a small number of large sites. This limits the type and location of future development and will ultimately limit housing choice. The nature of development and the type of developers taking on these sites will necessarily be limited. The Council should look to provide a variety of housing sites in different sustainable locations, particularly where this can meet the needs of the Category 1 settlements for growth where demand is likely to be highest.
4. Should the Plan include some small and medium size sites in order to provide greater choice and flexibility and accord with NPPF paragraph 68?

- 1.14 Small and medium sites are recognised in the NPPF as making an important contribution to the housing supply, particularly for shorter-term delivery. The Council has totally failed to select such sites, nor is there evidence to demonstrate that the Council has actively sought to identify such sites. While the Green Belt Review identified a selection of smaller sites for potential release, the Council did not take these any further and has not provided a justification for this approach.
- 1.15 While it is likely that windfall sites will be generally small and medium in size, there is no guarantee that such sites will come forward. The Council should therefore take a proactive role in identifying suitable and sustainable small and medium sized housing sites. Where these are in the Green Belt, identification and release through the Local Plan process is vital to enable these to come forward.
- 1.16 In this regard therefore the Local Plan does not accord with the NPPF.
5. 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?
- 1.17 The Council relies on windfall sites to make up 12% of housing supply. The figures used have been copied over from the Council's 2017 AMR trajectory windfall. There is no justification or evidence supporting the figure set out in the 2017 AMR. It should also be noted that this figure also differs to the 2018/19 trajectory windfall figure, which would seem to be the most up to date.
- 1.18 The NPPF is clear regarding the inclusion of windfall figures that *"there should be compelling evidence that they will provide a reliable source of supply"* (paragraph 70). The Council must provide a windfall figure that is supported by an assessment of the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

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WYG

Hearing Statement in Relation to the Independent Examination of The St Albans Local Plan

SITE PLAN

Whole available site area

(as submitted under our Regulation 19 representation)



Smaller potential sub-area for early development

