

# ST ALBANS CITY AND DISTRICT LOCAL PLAN EXAMINATION

## Matter 3: Settlement Strategy, Settlement Hierarchy and Development Strategy (Policies S1 and S2)

### Hallam Land Management and St Albans School

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

**Question 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?**

#### ***Basis***

1. The Spatial Strategy in Policy S1 is based on directing new development towards the District's main urban settlements, namely St Albans, Harpenden, London Colney and also to the urban fringe of Hemel Hempstead which immediately adjoins the District's administrative boundary.
2. These are described as *"the most accessible locations for development, with the widest range of services and facilities"*.
3. This principle has been a feature of the Local Plan throughout its long gestation period but is also a reflection of earlier strategic policies set out in the successive strategic and local plan.
4. The 1994 St Albans Local Plan which was derived from the earlier 1986 Hertfordshire Structure Plan included Policy 2 which identified a settlement hierarchy where St Albans and Harpenden were designated as 'Towns' where *"development will generally be concentrated"*.
5. The 1998 Hertfordshire Structure Plan incorporating the 1991 Alterations included Policy S1 which intended that future housing and community needs would be met in ways which *"minimise the need to travel and otherwise exploit the sustainability advantages of urban concentration, with the prime emphasis on regeneration in the County's main towns"*. In this context, Policy S6 intended that development would be generally concentrated in the following settlements and in accordance with local plans...St Albans...Harpenden...Hemel Hempstead.
6. Later, the 2008 East of England Plan identified Hemel Hempstead as a Key Centre for Growth and Development and anticipated that the Green Belt within St Albans District would be reviewed in order to enable development to support Hemel Hempstead's sub-regional role in this regard.
7. St Albans, Harpenden and London Colney are the three largest settlements in the District and were identified as the focus for development in the 2016 Draft Local Plan, along with development east

of Hemel Hempstead. London Colney was re-designated as a Town at that point. Strategic Sites were also identified at St Albans (east), Harpenden (north west) and Hemel Hempstead (east).

8. In the context of greater development requirements now needing to be met the role and function of these settlements is rightly retained and enhanced. Additional Broad Locations for development have been identified at St Albans (north), Harpenden (north east), and the Hemel Hempstead Broad Location has been enlarged. A new Broad Location has been identified at London Colney.
9. It is evident therefore that the strategy to focus new development at these main settlements in the Publication Draft Local Plan is consistent with the principle of concentrating new development in the most accessible locations consistent with objectives in the NPPF<sup>1</sup>.

### ***Approach to Distribution***

10. The Broad Policy Approach set out in table in Policy S1 relevant to each settlement Category provides the articulation of the strategy and distribution of growth across the District.
11. For example, at the main urban settlements, larger scale higher density development will be supported so long as it respects local character and heritage. Whereas, in the various Green Belt Settlements, a very different scale of development is anticipated, limited to small scale infilling and redevelopment of previously developed land.
12. This assists the decision-maker in considering individual development proposals relative to the spatial strategy and settlement hierarchy.

### ***Alternatives***

13. The alternatives to this approach are described in the Sustainability Appraisal<sup>2</sup> and comprised:
  - Option 1a): Mixed Location / Scale Development;
  - Option 1 b): As 1a) with smaller, but more, sites;
  - Option 2: Dispersed Development; and
  - Option 3: Concentrated Development.
14. In effect this considered the following potential strategies:
  - Add more homes into existing built-up areas
  - Build on 8 areas that least meet Green Belt purposes
  - Expand existing villages into the Green Belt
  - Further expand existing towns into the Green Belt (500 – 5,000 homes)
  - Create new 'Garden Village(s)' in the Green Belt (1,500 – 10,000 homes)
15. The SA<sup>3</sup> states that *"The Council's preferred approach was based on Option 1a and this was therefore taken forward when developing the draft SLP which was subject to consultation in late-*

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<sup>1</sup> Inter alia paragraphs 102, 103 and 104

<sup>2</sup> CD009 Section 4.4.1

<sup>3</sup> CD009 Appendix E

*2014. The principles included in the assessment above from 2014 will remain valid as the start point for the Local Plan 2020-2036" (emphasis added).*

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

16. We do not have any comments on this question.

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

17. We do not have any comments on this question.

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

20. We interpret the Classification in Policy S1 entitled "Rest of the Green Belt" to constitute areas of countryside but this is not explicit in the Policy absent any explanatory text. In such instances, the broad policy approach intends to restrict the scope for development by reference to national and local Green Belt Policy. In this regard, paragraphs 143 – 147 of the NPPF and Policy S3 provides the relevant policy context to determine planning applications.

**Question 5. Is there a need to define settlement boundaries?**

21. We do not have any comments on this question.

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

22. The Development Strategy in Policy S2 is simply an articulation of Policy S1 which defines the settlement hierarchy and provides the contextual position as regards the allocations of Broad Locations in Policy S6. It does little to assist the decision-maker beyond Policies S1 and S6.

**Question 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?**

23. The Publication Local Plan's housing trajectory illustrates a range of sources of housing land which will provide a range of housing opportunity and choice. It can be expected that the urban sites will comprise of higher density housing characteristic of built up areas or much smaller scale infill opportunities.

24. The Broad Locations themselves are of varying sites with several sites of less than 500 dwellings and other significantly larger.
25. These larger scale developments provide the flexibility to provide a significant range and choice of housing opportunity derived from different design approaches to neighbourhood and character areas within any single Broad Location. This militates against the uniform housing provision and ensures different size, type and tenures of housing across the Plan area.

**Question 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?**

25. We do not have any comments on this question.

**Question 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?**

26. It is implicit in the housing trajectory that the strategy does rely upon windfall housing. In order to meet the strategic housing requirement of 14,608 new housing, windfall development is a component part of the supply strategy amounting to 1670 new homes between 2020-2036.
27. There is no recognition of this in the Plan's strategy policies other than by reference in Policy S4 to the housing trajectory in Appendix 2. The extent to which there is compelling evidence that they will provide a reliable source of supply is addressed in *Matter 8*.

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**9<sup>th</sup> December 2019**