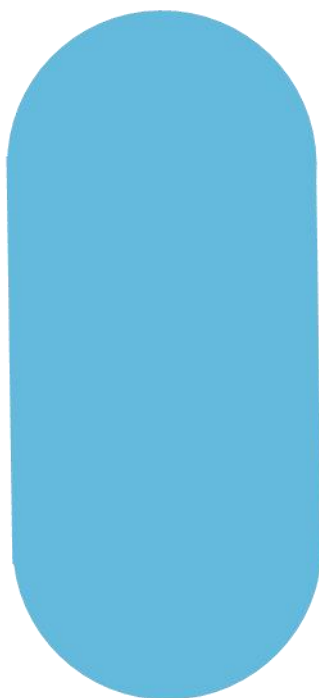
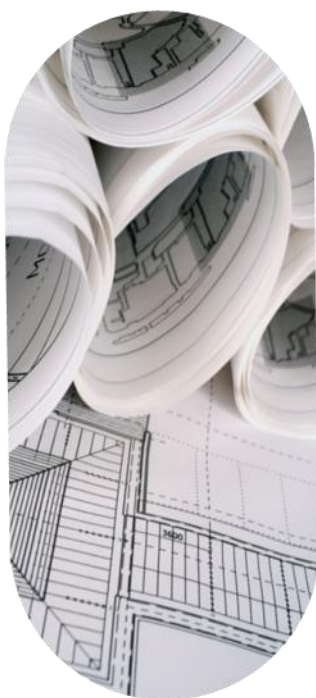


**WRITTEN STATEMENT IN RESPECT OF THE ST ALBANS CITY
AND DISTRICT LOCAL PLAN EXAMINATION**

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

On behalf of Martin Grant Homes and Kearns Land Ltd



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our clients, Martin Grant Homes and Kearns Land Ltd, in respect of its interests in land to the east of Redbourn, as part of the forthcoming examination (EIP) of the St Albans City and District Local Plan.

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

- 1.2 The representations made below respond to specific questions raised in the Inspector's Matters, Issues and Questions paper for the Examination in so far as they are relevant to our clients.

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

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?

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

- 1.3 The spatial strategy for the Local Plan appears to have been progressed, principally, on the basis of testing the options for the overall housing number and a series of broad locations for development which respond to the settlement hierarchy. It is not apparent that there has been any testing of the options for distribution (urban concentration, sustainable urban extensions, dispersed approach, new settlement etc.) with regard to geography or settlement hierarchy.

- 1.4 Policy S1 identifies Redbourn as a Category 2 Settlement (Large Village - settlements excluded from the Green Belt). Our clients support the identification of Redbourn within the second tier of the settlement hierarchy.
- 1.5 However, SADC's approach to development in the Category 2 settlements through the spatial development strategy is not supported. SADC states in Policy S1 that:
- "the scale and density of development [in the Category 2 settlements] will generally be lower than in the Category 1 settlements. This is to reflect the lower level of services available and in order to retain their particular character."*
- 1.6 Whilst this implies that a reasonable scale of new development will be permitted in the Category 2 Settlements, a reading of the wider plan confirms that housing growth in all but one of the Category 2 settlements will be restricted to infill development.
- 1.7 The Sustainability Appraisal (September 2018) concludes that Policy S1 provides a balance between focusing the majority of development in the key settlements whilst allowing for some limited development in the smaller settlements. However, there is a distinct lack of development in the larger villages (see response to question 8 below).
- 1.8 In its present form, Policy S1 is not considered to be sound as it is not justified or consistent with national policy. This policy needs to be justified by evidence. It is our clients' position that there is a need for medium sized sites in the category 2 villages to meet local need (for example as evidenced in the emerging Redbourn Neighbourhood Plan) as part of an approach for meeting the housing requirement that recognises the importance of small and medium sized sites (Framework: paragraph 68).

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

- 1.9 Given the extent of Green Belt coverage in the District, our clients are of the opinion that housing need in the District is likely to create the exceptional circumstances required to justify alteration of Green Belt boundaries. However, we do not consider that the Council has fully evidenced and justified the exceptional circumstances for Green Belt release as required by the Framework: paragraph 136 (see Martin Grant Homes and Kearns Land Matter 4 statement).
- 1.10 The Inspectors' Initial Questions quite appropriately refers to the two stages for Green Belt Review (ED1: Q16). The Council's response (ED18) points, in simplistic terms, to the Green Belt designation for St Albans being so extensive and work not being sufficiently advanced on the JSP that land development has to take place within the Green Belt.
- 1.11 The Inspectors' have responded (ED23: paragraphs 12-20) to say that a thorough investigation of the capacity of the existing urban areas is needed and that the Council has not explained St Alban's approach to the Green Belt and why the changes sought are justified. The Council has responded by way of the SADC Green Belt Topic Paper (ED25C) which claims that the housing trajectory performs the 'thorough investigation of the capacity of existing urban areas' and that the Green Belt Review Sites and Boundaries Study February 2014 (ED25C) considered broad locations in the context of the lack of non-Green Belt land.
- 1.12 We do not consider the Council's evidence demonstrates that it has examined fully all other reasonable options for meeting its identified need for development in accordance with paragraph 137 of the Framework.
- 1.13 Specifically, we do not accept SADC's statement that "*the exceptional*
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circumstances required for Green Belt release for development only exist in the Broad Locations". Nor do we accept that only the proposed Broad Locations "minimise adverse impacts on the purposes of the Metropolitan Green Belt."

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?

- 1.14 No. The approach taken by the Council does not consider 'small scale sub-areas' which could be released for development without undermining the strategic function or harming the openness of the Green Belt. This includes our clients' site which *"makes a limited or no contribution towards checking sprawl, preventing merging, safeguarding the countryside, preserving setting or maintaining local gaps"* (GB004: 8.3.6).
- 1.15 The Council has only considered sites capable of accommodating residential development of a minimum of c.500 dwellings or 14 hectares of developable land. The justification for this is not made explicitly clear in the evidence base / Sustainability Appraisal and as a result, the case has not been made for reasonable alternatives for sustainable sites which will not adversely impact upon the purposes of the Green Belt.
- 1.16 We are not aware that the development strategy has considered local housing needs. Our clients have concerns about the manner in which sites have been assessed during the Local Plan process and the failure to have regard for the aspirations of the Redbourn Neighbourhood Plan, the Pre-Submission Draft (Regulation 14) of which recommended the release of our client's site from the Green Belt (see Martin Grant Homes and Kearns Land Matter 1 statement: Q16).
- 1.17 As stated above, the Council's strategy is to meet housing needs at a

number of 'Broad Locations'. This strategy must be considered in the context of paragraph 23 of the Framework which makes clear that with regards to broad locations for development "*Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.*"

1.18 Unfortunately, there is insufficient evidence to support the strategy for meeting the Council's housing requirement predominantly at these Broad Locations (see Martin Grant Homes and Kearns Land Matter 8 statement).

1.19 The Sustainability Appraisal states that this strategy will provide the best opportunity for the provision of new supporting infrastructure, services, facilities and open space (CD010: page 275). Whilst this does not appear to have been tested against the reasonable alternative distributions it should be noted that smaller scale development in the sustainable Larger Villages provides opportunities to deliver social benefits. In the case of Redbourn, our clients' proposals will provide significant areas of public open space, new recreational routes, and affordable housing to meet local need, with the benefit of not requiring onerous infrastructure commitments that will delay the delivery of housing until later on in the plan period.

1.20 In its current form, Policy S2 is not sound as it is not positively prepared, justified or consistent with national policy.

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?

1.21 Yes. The Local Plan does not provide for an appropriate balance of sites

in the context of the Framework: paragraph 68. Choice and flexibility in the housing provision, through small and medium sized sites, is essential for meeting the housing requirement of the area. The plan only allocates 365 homes in the six large villages; through a single site for 365 homes at Chiswell Green. This means 5 of the large villages are restricted to only windfall developments and given the size of the allocation there are no medium or smaller sites which can deliver at pace. It is our view that the delivery of housing across a range of sites is not adequately planned for (see Martin Grant Homes Matter 8 statement).

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?

- 1.22 The housing trajectory includes 1,891 homes through a specific 'windfall allowance'. Other sources of housing supply include 880 homes from 'local Plan/NPPF Policies – Delivering Urban Optimisation (2,771 homes in total). We have not seen any explanation of where these homes are expected to take place and in that respect consider these are likely to be unidentified windfall sites.
- 1.23 Other sources in the trajectory include 'SHLAA sites and other sites' (273 homes), garage sites programme (89 homes), office to residential prior approval 10% discount (480 homes) and council owned sites (260 homes). The Council should identify the specific parcels of land which will contribute the homes necessary to satisfy the quantum shown in the trajectory for each source (1,102 homes in total). In the absence of this, the homes must also be assumed to be windfall.
- 1.24 The trajectory also recognises 3,906 homes 'known/expected' to be delivered at the Broad Locations but a further 4,892 which do not warrant any label to suggest they are 'known or expected'. This is a significant concern.

- 1.25 It appears as though the strategy is heavily reliant on windfall housing as part of the anticipated supply. There does not appear to be any compelling evidence that the 2,771 homes from windfalls and urban optimisation will provide a reliable source of supply. There are also concerns over a further 1,102 homes shown in the trajectory as set out at 1.23 above.