

St Albans Local Plan Examination

Matter 6: The Broad Locations for Development (Policy S6) – General Matters (Policy S6) and Strategic Infrastructure (Policies L17 and L18)

Session Date Wednesday 5 February 2020

Participant Lichfields for Legal & General (L&G)

Our ref 60885/01/18048029v5

Date 12 December 2019

1.0 How were the broad locations for development selected, and what evidence documents were produced to inform their selection?

- 1.1 This is principally a question for the Council to answer.
- 1.2 L&G observe that SADC adopted a multi stage approach to the assessment of strategic sites, over an extended period of time, most recently presented in reports to the 22 May and 18 June 2018 Planning Policy Committee meetings. Further reporting was presented in July 2018 following the submission of developer proformas to confirm and/or comment on the outcomes of the Council's process. L&G participated in the 2018 verification process in respect of North West Harpenden and in earlier discussions relating to the evaluation and allocation of North West Harpenden in earlier draft plans.
- 1.3 The most recent 'Strategic Site Selection Evaluations' in 2018 considered the findings of the Green Belt Review as well as a range of other deliverability and sustainability considerations. The North West Harpenden Broad Location was shortlisted for allocation based on a similar exercise in 2014 and retained in the latest draft Local Plan following the 2018 (re)evaluation.
- 1.4 The North West Harpenden Broad Location site was selected due to its suitability to contribute to meeting housing, infrastructure and other development needs over the plan period. Specifically, the selection of North West Harpenden as a Broad Location recognised the site presents the opportunity to deliver an inherently sustainable development which is: well-related to the existing built-up area of Harpenden; contains no site specific constraints; deliverable by one principal owner; and it is located so as to enable access to a wide range of service, facilities and employment opportunities.

2.0 Have landscape, agricultural land, flood-risk, natural heritage and heritage assessments been carried out to inform the locations of the proposed broad locations?

- 2.1 L&G has no comments on this question.

3.0 Is the Sustainability Appraisal of the options for the broad locations robust?

- 3.1 L&G has no comments on this question.

4.0 Are the locations of the proposed broad locations adequately identified on the policies map? Should they be more clearly defined?

- 4.1 L&G regards the boundary of the North West Harpenden Broad Location as clearly shown. As noted in L&G's Regulation 19 representations, it should however be made clear that this boundary provides an allocation for development.
- 4.2 It is recognised that, as currently drafted, the 'hatching' and 'N.B' note on the Policies Map (CD003) seek to clarify that the school site is included within the Broad Location allocation but not removed from the Green Belt. L&G does not consider this approach to be satisfactory or provide adequate certainty. L&G believes that the Green Belt boundary should be amended, with the primary school site identified by an allocation on the Local Plan Policies Map as an area for the development of education facilities at North West Harpenden.

5.0 What are the anticipated timescales for the proposed masterplans? What form will these take? Are they being progressed alongside the Local Plan?

- 5.1 L&G, SADC and HCC have been progressing the masterplanning process for the design and delivery of development at North West Harpenden in parallel with the emerging Local Plan submission.
- 5.2 This process, which has been managed in the context of a PPA, began in August 2019 and has so far included monthly design workshops, discussions with Hertfordshire County Council and an independent Design Review Panel.
- 5.3 The work to date indicates that the draft Strategic Sites Masterplanning Toolkit (July 2019) is generally fit for purpose and the deliverable from this process will be a masterplan document for the North West Harpenden Broad Location. The Council has commissioned graphic designers who have recently prepared a draft template for the final document which responds to the scope set out in the Toolkit.
- 5.4 Public consultation activity to inform the masterplanning process was delayed by the pre-election period for the General Election. Activity is however planned and an independent consultant has been appointed. A series of events, including a public exhibition, as part of a wider programme are expected to have taken place ahead of the site-specific examination session on 11 February 2020.
- 5.5 Progress to date with the masterplan process indicates that it could be endorsed by the Council's Planning Policy Committee and Cabinet in June 2020, with a further pre-election period for local elections constraining the opportunity to progress and endorse the document at an earlier date.

6.0 Should the Broad Locations East and North of Hemel Hempstead be considered comprehensively as one broad location?

- 6.1 L&G has no comments on this question

7.0 In allocating larger scale sites have the Council considered the advice in paragraphs 72 a-d of the NPPF? If so where can we find the evidence to support this?

7.1 This is principally a question for the Council, but in relation to North West Harpenden L&G observes that SADC has considered and responded to the opportunity to establish a sustainable, integrated and well-connected extension to Harpenden, one of the largest towns in the District which will provide new residents on the site with access to a range of existing facilities, services and employment opportunities.

8.0 8 What strategic infrastructure is necessary for the Plan to be implemented? Is this clearly set out in a policy/policies in the Plan? If not, should it be?

8.1 L&G has no comments on this question.

9.0 Have the infrastructure requirements of the broad locations and other strategic infrastructure been adequately identified and costed in an up to date IDP? Including the requirements for;

- a *Road improvements;*
- b *Public transport systems and sustainable transport networks;*
- c *Water supply and waste water treatment*
- d *The provision of electricity/gas and other services*
- e *Primary healthcare*
- f *Schools and early years' provision*
- g *Green infrastructure*
- h *Leisure and sports facilities*

9.1 L&G has no comments on this question.

10.0 Are any infrastructure requirements missing?

10.1 In relation to North West Harpenden, L&G believes that the necessary infrastructure requirements have been identified.

11.0 Are there known sources of funding, particularly for development expected to be delivered in the next 5-7 years of the Plan? Are these all in the Council's latest Infrastructure Delivery Plan?

11.1 L&G has no comments on this question.

12.0 Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?

12.1 In relation to North West Harpenden, L&G believes that the necessary infrastructure requirements can be delivered within the necessary timescales.

- 13.0** **Should policy S6 make more specific requirements as regards the provision and timing of the infrastructure needs for the proposed broad locations?**
- 13.1 L&G has no comments on this question.
- 14.0** **Are there effective mechanisms in place between the Council, other neighbouring authorities and infrastructure providers to co-ordinate the planning and provision of infrastructure?**
- 14.1 L&G has no comments on this question.
- 15.0** **Will the broad locations for development have any potential cross boundary transport impacts? How will these be addressed?**
- 15.1 L&G has no comments on this question.
- 16.0** **Is any of the strategic infrastructure reliant on other development coming forward in neighbouring authorities?**
- 16.1 L&G has no comments on this question.
- 17.0** **Will the delivery of key infrastructure allow for the delivery of planned development in line with the housing trajectory in the Plan? If not, what will be the shortcomings and how will the Council address these matters?**
- 17.1 L&G has no comments on this question.
- 18.0** **Are there any other constraints on the delivery of strategic infrastructure?**
- 18.1 L&G has no comments on this question.
- 19.0** **What are the implications of allocating the site of the approved Strategic Rail Freight Interchange at Park Street Garden Village for housing? Can an alternative site be provided? What are the wider cross boundary/national consequences of the Interchange not being delivered there?**
- 19.1 L&G has no comments on this question.

20.0 In response to our initial question – ‘Have the Council undertaken a whole plan viability assessment of the submitted Plan to ensure that the policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan? If so, can you direct us to it please?’ the Council replied ‘Yes, the St Albans CIL and Viability 26th March 2019, assessed the viability of the emerging Local Plan...The assessment included looking at the cumulative cost and impact of the proposed (and now in similar form final) draft Plan.’

Has the economic viability of each of the proposed broad locations been adequately demonstrated in the St Albans CIL and Viability Report (Nov 17)? Is the study robust and does it demonstrate that the local plan is viable and based on reasonable assumptions? In particular:

- a) Is it based on the publication version of the Plan or a previous draft?*
- b) Has the viability assessment been carried out in accordance with the advice in the PPG and is it up to date?*
- c) Are appropriate assumptions made about the level and timing of infrastructure costs and other costs associated based on the most up to date IDP?*
- d) Is there a contingency allowance? If not, should one be included?*
- e) Are appropriate assumptions made about the rate of output?*
- f) Are appropriate assumptions made about the timing of land purchases?*
- g) Is the viability threshold set at an appropriate level?*
- h) Should an allowance have been made for inflation?*
- i) Is an appropriate allowance made for finance costs?*
- j) Is the residual value methodology appropriate?*
- k) Has income from commercial floorspace been factored into the calculations?*

20.1 L&G has no comments on this question.