

## **MATTER 6:**

## **BROAD LOCATIONS**

**St Albans Local Plan Examination in Public Hearings**

**SUBMITTED ON BEHALF OF STACKBOURNE LIMITED**

**December 2019**



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## 1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of Stackbourne Ltd, the freeholder and promoter for land at Smallford Works, Smallford.
- 1.2 This Statement is made in response to the published 'Matters, Issues and Questions'. This Statement covers those questions posed within Matter 6 – The Broad Locations for Development (Policy S6) – General Matters (Policy S6) and Strategic Infrastructure (Policies L17 and L18).
- 1.3 Stackbourne Ltd has submitted an outline application (Ref: 5/2019/3022) for up to 100 dwellings for land at Smallford Works, demonstrating that there are no technical constraints to the delivery of the site, the principle of residential development for up to 100 dwellings can be considered acceptable when assessed against the policies of the NPPF, and there are significant benefits that would result from its redevelopment, including:
- Environmental enhancements from the clean-up of intensive industrial uses to that of residential, including a significant increase in green infrastructure;
  - Fewer overall trips at peak AM, PM and throughout the day compared to the existing use, including the removal of a significant number of HGV trips throughout the day; and
  - The provision of much needed market and affordable housing in an area of historic significant shortfall in housing delivery and some of the worst affordability for local residents in the country.
- 1.4 This Hearing Statement raises concerns with the assessment process the Council has taken in choosing its Broad Locations, including the unsound approach to the site selection assessment and the omission of the Smallford Works site from this process.

## 2 BROAD LOCATIONS FOR GROWTH

### Q1. How were the broad locations for development selected, and what evidence documents were produced to inform their selection?

- 2.1 We address in some detail in our Matter 3 and Matter 4 Hearing Statements the unjustified approach the Council took to adopting its Spatial Strategy, of which the Broad Locations form a predominant component. There has been a fundamental failure to assess the deliverability of small-medium sites and the role that these will play in the early years of the Plan in addressing the acute affordability crisis in the District.
- 2.2 The Council points to a three stage selection process for the Broad Locations, comprising:
- Stage 1
    1. Green Belt Review (GBR) evaluation
  - Stage 2
    2. Suitability
    3. Availability
  - Stage 3
    4. Unique contribution to improve public services and facilities
    5. Unique contribution to enhancing local high quality job opportunities
    6. Unique contribution to other infrastructure provision or community
    7. Deliverable / Achievable
    8. Overall Evaluation
- 2.3 In reality, the selection process began far before this process, with three broad locations and eight alternative broad locations identified as part of The Draft Strategic Local Plan – November 2012. The selection of the Broad Locations at this time are not understood to have been informed by a Green Belt Assessment and indeed, the publication of the Draft Plan was delayed in order to carry out a Strategic Green Belt Review.
- 2.4 The Green Belt Review was then commissioned in 2013 and carried out in two step process. We provide detail within our Matter 4 Hearing Statement in why this Review has failed to provide an objective assessment, making Stage 1 of the selection process unsound in its approach.
- 2.5 Prior to this though, the 2018 Strategic Site Selection Process applies an initial, unexplained and unjustified threshold of 500 dwellings in order for sites to qualify for consideration.

- 2.6 Even were this threshold deemed an acceptable first filter of sites, the Council has snubbed Smallford Works from the assessment. Where applicable, the assessment has combined a number of smaller sites in order to form one that delivers in excess of 500 dwellings.
- 2.7 In relation to Site 615, Land West of Sleapshyde, this was done by combining sites 72, 78, 156 (part), 245, 454 and 581. However, this excluded Smallford Works, which was put forward as part of the 2018 Call for Sites and is surrounded by site 615 on three sides, forming a logical comprehensive site. A map showing Site 615 outlined in red and the extent of Smallford Works is included at Appendix A, with our 2018 Call for Sites submission at Appendix B.
- 2.8 We see no logic why Smallford Works was not included in 615; however, its exclusion is considered contrary to Paragraph 137a of the NPPF.
- 2.9 Given the unsound approach to the selection of Broad Locations, and the Green Belt Review to inform Stage 1, we do not comment on the further stages of the assessment.

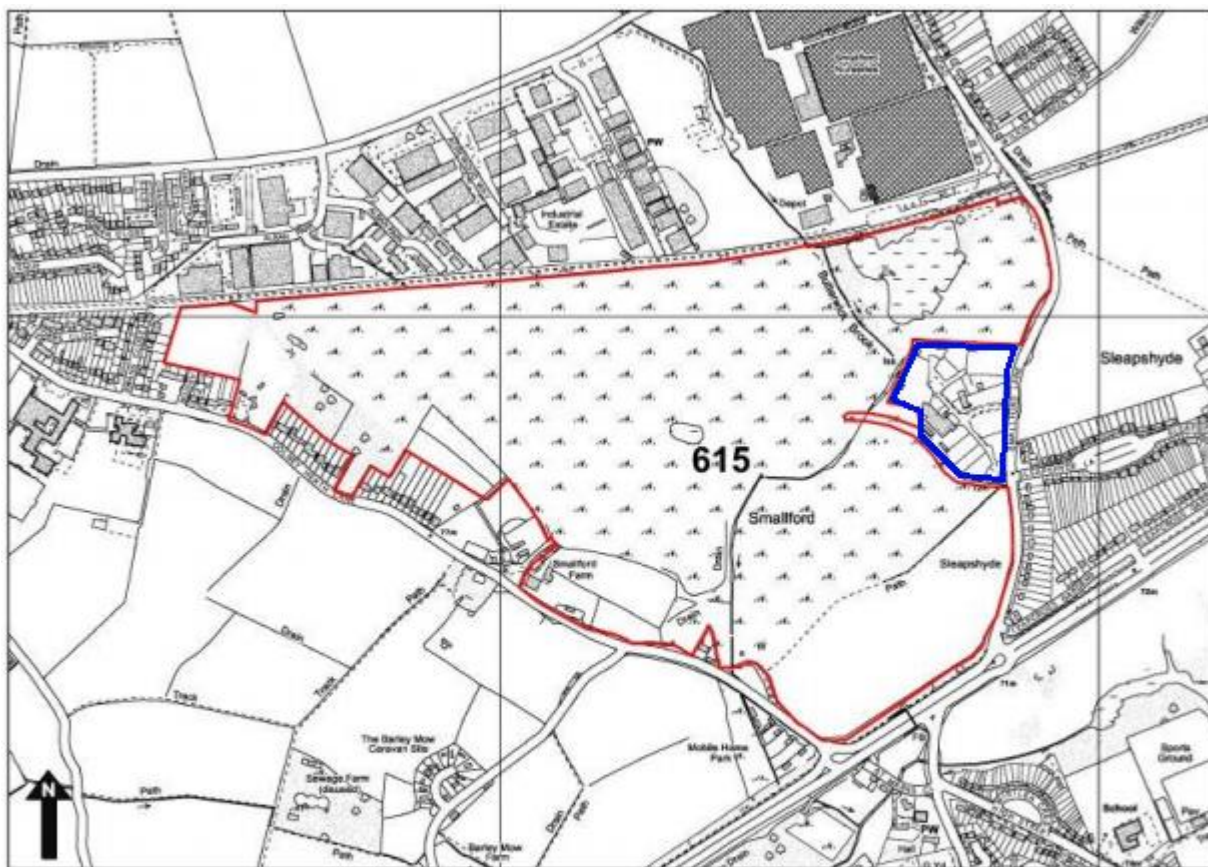
## **Q6. Should the Broad Locations East and North of Hemel Hempstead be considered comprehensively as one broad location?**

- 2.10 The Local Plan is required to consider the cumulative impacts of the Plan as a whole.
- 2.11 This principle extends to not just the sites east nad north of Hemel Hempstead, but also land north of Harpenden. With regard to Green Belt, the Council would need to consider the cumulative impact of the two sites on creating sprawl within an identified area that is sensitive to such development<sup>1</sup>.

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<sup>1</sup> See Green Belt Assessment of parcels and at Figure 7.7 that identifies this area as playing a particularly significant role in protecting from sprawl.

## APPENDIX A: SITE SELECTION PROCESS SITE REF: 615



**Land West of Sleepshyde (SM-615)**

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## **APPENDIX B: 2018 CALL FOR SITES SUBMISSION**