

ST ALBANS CITY AND DISTRICT LOCAL PLAN EXAMINATION

Matter 6: The Broad Locations for Development (Policy S6)

Hallam Land Management and St Albans School

Main Issues: Whether the policies for the development and delivery of the Broad Locations for Development are justified, effective and consistent with national policy? Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for infrastructure needs of St Albans over the Plan period. Whether it contains effective mechanisms to secure the provision of strategic infrastructure as and when it is needed.

Question 1. How were the broad locations for development selected, and what evidence documents were produced to inform their selection?

1. The identification of the Broad Locations has been a feature of the gestation of the Local Plan over successive iterations. The Sustainability Appraisal Appendix E¹ provides a chronology of this.
2. With the exception of east of Hemel Hempstead which has its origins in the East of England Plan of 2008, the Broad Location emanate from the SKM Green Belt Purposes Assessments in 2013² and 2014³, the District Council's Development Sites and Strategy Options Evaluation Technical Report⁴ and then more recently in 2018 what is termed in ED25C the 'Strategic Site Selection Work'⁵.
3. The 2013 SKM Assessment, conducted across three administrative areas Dacorum, St Albans and Welwyn and Hatfield, was undertaken to inform respective future planning strategies⁶. In the case of St Albans this was to "inform the emerging Local Plan and to meet NPPF requirements in the context of recent Inspector's decisions at Local Plan examinations". This Assessment considered strategic land parcels in the study area against the purposes criteria for Green Belt and identified 'strategic sub-areas' for further assessment⁷. These areas of land were considered to contribute least towards the four national Green Belt purposes and local Hertfordshire purpose.

¹ CD009

² GB003

³ GB001

⁴ SLP003

⁵ Planning Policy Committee May 2018

⁶ GB004 (Para 1.13)

⁷ GB004 (Figure 8.1)

4. In February 2014, an individual report for St Albans District was published⁸. Para 1.1.3 describes the purpose of the study as a further assessment of the identified as strategic sub-areas. Through this work the Green Belt land and boundaries within and around these strategic sub-areas were assessed in greater detail to identify parcels of land which may potentially be favourable for release from the Green Belt and any associated revisions to Green Belt boundaries. The findings of the study were to *“inform future choices by the Council on how to strike the balance between development needs and Green Belt restraint”*.
5. In particular, the main objectives of the study⁹ included:
 - Further investigation of primary and secondary environmental constraints on individual parcels / sites;
 - Landscape value analysis as an integral component of the detailed assessment;
 - An assessment of the contribution of sites to sustainable patterns of development to inform subsequent sustainability appraisal;
 - A detailed review of boundaries for those strategic sub-areas shortlisted for assessment; and
 - Development of a ranking system which identifies those parcels/sites most favourable for potential release from the Green Belt.
6. As described in Question 2, the assessment process considered a range of factors to determine, firstly, whether amending the Green Belt boundary in any one location was appropriate in terms of Green Belt purposes and, secondly, whether the sub-area was an appropriate location for future development.
7. The District Council subsequently undertook its own Technical Assessment of potential growth locations drawing upon the locations identified by SKM as part of preparing the Strategic Local Plan in 2016 entitled ‘Development Site and Strategy Options Evaluation’¹⁰. The evaluation framework considered a range of factors that sought to represent the concept of sustainable development as defined in the NPPF. This led to a ranking of the various locations¹¹.
8. This District Council were then able to apply the conclusions of its assessment to various development strategies and growth option as part of the Local Plan process at that time.
9. In the event, and with preparation of the current Local Plan in 2018 and the need to calculate the housing requirement by reference to the ‘Standard Method’, the scale of growth was such that each of the development areas considered through the Technical Assessment were required to be allocated as Broad Locations, along with other sites which followed a ‘Call for Sites’ in January 2018.
10. The subsequent process of assessment at this stage was conducted under the heading of ‘Draft Strategic Site Evaluation Outcomes’ considered by Planning Policy Committee in May 2018.

⁸ GB001

⁹ GB001 (para 1.1.2)

¹⁰ SLP003

¹¹ SLP003 (Para 2.1.6)

11. Each site was assessed against three stages and eight criteria as follows:

Stage 1. (criteria 1) Green Belt Review evaluation

Stage 2. (2) Suitability and (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

12. A Red, Amber, Green appraisal system was applied with sites which were considered Red being eliminated at various stages.

13. The PPC Report of June 2018 explains the following about these evaluations:

- 8 sites have an overall evaluation of Green. These are the same 8 sites that were concluded in the [Green Belt Review] as making the least contribution towards Green Belt purposes. These sites are East Hemel Hempstead (North), East Hemel Hempstead (South), Land at Chiswell Green, North East Harpenden, North West Harpenden, North St Albans, Land west of London Colney and East St Albans.
- 4 sites have an overall evaluation of Amber. These sites are South East Hemel Hempstead, North Hemel Hempstead, the Former Radlett Aerodrome and North East Redbourn.

14. All of the Green Sites and three of the Amber Sites are included as Broad Locations in the Publication Draft Local Plan. North East Redbourn is the site that has not been carried forward as a Broad Location. The selection of the Broad Locations was a matter of planning judgement on behalf of the District Council in the context of this evaluation. As ED25C explains at paragraph 1.20 *"the advantages of the three selected 'Amber' sites were considered by PPC to be greater than that for the non-selected fourth site"*.

15. The Sustainability Appraisal considered each of the Broad Locations included with the Pre-Submission Local Plan (Section 5.2.2.3 and Table 5.2.2). This provides an evaluation of the sites against each of the chosen SA Objectives and provides information about the potential beneficial and negative effects.

16. In addition, the District Council undertook a comparative assessment of development at North East Redbourn and development at Park Street Garden Village. Again, PPC exercised its planning judgement and came to the view that the North East Redbourn option would not deliver the

equivalent quantum of housing within the plan period and it would also not generate as many other significant benefits as those identified in association with the Park Street Garden Village.

Question 2. Have landscape, agricultural land, flood-risk, natural heritage and heritage assessments been carried out to inform the locations of the proposed broad locations?

17. Landscape characteristics and environmental and historic features were considered as part of the Green Belt Review Purposes Assessment (GB004) and were mapped in Appendices 3 and 4 of that Report¹².
18. Paragraph 5.2.8 states that this *“provide[s] baseline information about the study area and enable[s] a good understanding of the relationship between the features and the purposes of the Green Belt in particular locations”*.
19. Paragraph 5.2.12 further states *“Overall consideration of landscape, environment and historic features underpins all aspects of the parcel assessment. The analysis is essential to evaluate the parcel against the individual purposes. It also has a central role in the judgement of where Green Belt land is identified which makes the least contribution towards the four national purposes and the local Hertfordshire purpose.”*
20. Environmental constraints were further considered in the Development Site and Strategy Options Evaluation in 2014¹³ and the Draft Strategic Site Selection process in 2018¹⁴. Sustainability Objectives in the SA also included environmental considerations¹⁵.

Question 3. Is the Sustainability Appraisal of the options for the broad locations robust?

21. Yes, the Sustainability Appraisal of the Options for the Broad Locations is robust.
22. The SA records the various iterations of the Local Plan’s inception and the extent to which different options were considered throughout the process from 2010 onwards.

¹² This provides a graphical illustration of the following designations: Ancient Woodland, Scheduled Monuments, Parks and Gardens, Sites of Special Scientific Interest, County Wildlife Sites, Areas of Archaeological Significance, Areas of Outstanding Natural Beauty, Conservation Areas and Landscape Character Areas.

¹³ SLP003 The assessment criteria include consideration of: Environment Agency Flood Zones 2 and 3 and Strategic Flood Risk Assessment (SFRA) results; Proximity to Sites of Special Scientific Interest (SSSI); Proximity to Local Nature Reserve or Local Wildlife Site; Proximity to Ancient Semi-Natural; Whether there would be an adverse impact on a protected habitat or species?; Would development harm any trees protected by Tree Preservation Orders or other important trees?; Landscape Character Assessment (LCA) condition and sensitivity; Historic Landscape Characterisation; Landscape Institute Guidelines for Landscape and Visual Impact Analysis; Proximity to Conservation Area and impact upon setting; Proximity to Listed Buildings and impact upon setting; Proximity to Scheduled Ancient Monuments and impact upon setting; Proximity to Historic Parks & Gardens and impact upon setting; Presence of archaeological sites for local preservation.

¹⁴ Planning Policy Committee May 2018

¹⁵ CD009 Biodiversity, water resources, flood risk, soils, historic environment and landscape/townscape

23. It is instructive to note that at various stages different scale of growth were considered¹⁶. Alongside this different options were considered for where and how to meet the various scales of growth i.e. Strategic Sub Area Options and Development Strategy Options.
24. In the circumstances that existed by 2018 when the Publication Draft Local Plan was being prepared, the lower growth options were no longer appropriate and there was a need to consider further options in excess of those considered previously¹⁷. Further potential locations for development were identified and considered at this point (para 2.2.2, Tables 4 and 5, and Appendix B refer).

Question 4. Are the locations of the proposed broad locations adequately identified on the policies map? Should they be more clearly defined?

25. With respect to North St Albans, yes, the location of this broad location is adequately identified on the policies map.

Question 5. What are the anticipated timescales for the proposed masterplans? What form will these take? Are they being progressed alongside the Local Plan?

26. For North St Albans, preparation of the Masterplan Document commenced in June 2019. Since then the site promoters have met with Officers of St Albans District Council and Hertfordshire County Council on average twice a month to develop the Framework Plans and the Masterplan Document itself is expected to be substantially complete in December 2019.
27. The District Council has published a Masterplanning Toolkit which sets out the broad content and level of information required for each Masterplan Document. It is intended that the Masterplan provide information about *inter alia* arrangement of land uses, movement and transport, green space, open space and play space, urban design principles and management and place stewardship.
28. To facilitate this, the site promoters have entered into a Planning Performance Agreement with St Albans District Council and Hertfordshire County Council which includes a timeline that anticipates the draft Masterplan Document being presented to Planning Policy Committee and Cabinet in February 2020 as a precursor to the submission of an outline planning application in Spring 2020.

¹⁶ Appendix E8 Assessment of Strategic Local Plan Options – June 2014

¹⁷ Appendix E12 Local Plan SA Working Note (May 2018)

Question 6. Should the Broad Locations East and North of Hemel Hempstead be considered comprehensively as one broad location?

27. We do not have any comment on this question.

Question 7. 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?

29. Yes, we believe the Council has considered this advice.

30. Paragraph 72 is intended to inform the selection of locations for development requiring them in the first instance to be “well located”. It is evident from SLP003 that amongst the evaluation criteria was consideration of the settlement strategy (ie proximity to main settlements), the ability to contribute to a sustainable pattern of development (i.e. proximity to local services, facilities and employment), and accessibility (i.e. the availability of public transport). Suitability was a Stage 2 criteria in the May 2018 Draft Strategic Site Selection process.
31. A further consideration in Paragraph 72 is the ability for future development to be well design and to be supported by necessary infrastructure. These are both points which are captured and regulated by policies in the Local Plan and the Masterplan required in each instance rather than factors that influence site selection in the first instance.
32. As regards the individual criteria they variously concern, firstly consideration of opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains; secondly, the extent to which size and location will support a sustainable community; thirdly, establishing clear expectations for the quality of the development and ensure that a variety of homes to meet the needs of different groups in the community will be provided; fourthly, realistic assessments of likely rates of delivery; and lastly, whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.
33. Criterion A was part of the assessment framework in both GB001, SLP003 and the May 2018 Draft Strategic Site Selection process.
34. Criteria B and C are governed by the individual Local Plan policies which set out the various uses to be provided and infrastructure necessary to assimilate new development; this is considered as part of the IDP. Allied to this will be the Masterplan Document which is to guide high quality development.
35. Criterion D is addressed in Appendix 2 of the Local Plan; whilst specific comments are made in relation to this in response to Hearing Session 8, so far as North St Albans is concerned, we agree with the assumption made therein regarding delivery rates.
36. Finally, Criterion E is of little relevance as the District is entirely the subject of the Green Belt as presently defined.

Question 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?

37. The Infrastructure Delivery Plan¹⁸ provides an assessment of the effect of future growth and development anticipated by the Local Plan on social/community infrastructure, green infrastructure and physical infrastructure. For these various strands, it sets out the 'Impact of Development Proposed' followed by 'Delivery Mechanisms in the Local Plan'. The latter then corresponds with provisions in the Infrastructure Delivery Schedule (IDS) and the individual Broad Location Policies.
38. For example, the assessment relating to the increase in primary school children leads to the identification of the number of additional primary school places arising from the projected increase in population and the consequential location of new primary school are identified in the assessment table and replicated in the IDS. These are incorporated into the Broad Location Policies where relevant.
39. In addition to the infrastructure requirements being listed in individual Policies for the Broad Locations, Policy L17 provides a framework for securing such provision as part of the development management process.

Question 9. 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; and h) leisure and sports facilities.

40. None of the work undertaken in preparing the Masterplan Document for North St Albans so far has identified any infrastructure requirement beyond those referenced in the Infrastructure Delivery Plan. None of the infrastructure costs estimated presently are considered prohibitive.

Question 10. Are any infrastructure requirements missing?

41. None of the work undertaken in preparing the Masterplan Document for North St Albans so far has identified any infrastructure requirement beyond those referenced in the Infrastructure Delivery Plan.

¹⁸ INFR001

Question 11. 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?

42. The Infrastructure requirements associated with North St Albans are expected to be funded mainly by the developer. There is no significant expectation that other sources of funding will be required to facilitate development in this location.

Question 12. Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?

43. In so far as North St Albans is concerned, the infrastructure requirements are expected to be delivered directly by the development or in-directly by way of off-site works or financial contributions via Section 106 Agreements. There is no suggestion that such infrastructure provision would not be provided within the required timescale.
44. Policy L18 Transport Strategy rightly highlights the interrelationship between new development and the pattern of movement and behaviour sought by the Local Transport Plan district wide. In this context, the public transport and pedestrian and cycle improvements arising from development at North St Albans, East St Albans, Park Street and London Colney and elsewhere in the urban areas from other sources will require a co-ordinated strategy to ensure that a comprehensive package of such measures are provided within St Albans Town. Through the North St Albans Masterplanning exercise the District Council and County Council have begun to consider this.

Question 13. Should policy S6 make more specific requirements as regards the provision and timing of the infrastructure needs for the proposed broad locations?

45. For each Broad Location, Policy S6 provides a list of the infrastructure requirements to be provided alongside development. With the exception of the strategic highway improvements necessary in conjunction with development at Hemel Hempstead, the infrastructure requirements are expected to be delivered directly as part of the development or in-directly by way of off-site works or financial contributions via Section 106 Agreements.
46. There are likely to be other utility infrastructure requirements but these should only be identified where they are strategic in nature.
47. In the case of North St Albans, the utility infrastructure requirements are local to the site only and comprise small scale improvements of upgrades conventionally associated with new development. On this basis, we do not consider there is any need for additional references in Policy S6.
48. A small part of the North St Albans Broad Location is currently used as playing fields by the Old Albanians Sports Association (OASA). This use is on the basis of a lease between the landowner

and OASA. These playing fields will be relocated as part of the proposed development, consistent with Policy L22 of the Local Plan¹⁹ and Sport England's Playing Fields Policy and Guidance²⁰.

49. Through the masterplanning exercise a location immediately adjoining the northern boundary of the allocation east of the existing playing fields has been identified. This is land that is within the Green Belt but such a use would constitute appropriate development in the Green Belt consistent with paragraph 145(b) of the NPPF. Moreover, Policy S3 of the Local Plan²¹ allows such re-provision in these terms also.

50. An additional criterion could be added to Policy S6 to capture this as follows:

x. re-provision of existing playing fields on land immediately adjoining the Site.

Question 14. Are there effective mechanisms in place between the Council, other neighbouring authorities and infrastructure providers to co-ordinate the planning and provision of infrastructure?

51. We do not have any comment on this question.

Question 15. Will the broad locations for development have any potential cross boundary transport impacts? How will these be addressed?

52. We do not anticipate that there would be cross boundary transport impacts arising from development at North St Albans.

Question 16. Is any of the strategic infrastructure reliant on other development coming forward in neighbouring authorities?

53. None of the infrastructure associated with development at North St Albans relates to a neighbouring authority.

Question 17. 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?

54. In so far as North St Albans is concerned, the infrastructure requirements are expected to be delivered directly by the development or in-directly by way of off-site works or financial contributions via Section 106 Agreements. There is no suggestion that such infrastructure

¹⁹ Policy L22, First Paragraph: Development which would lead to the loss of [sports facilities] will not be permitted unless suitably re-provided elsewhere.

²⁰ Exception Test 4 requires equivalent or better quality, equivalent or better quantity, in a suitable location and with equivalent or better accessibility and management arrangements.

²¹ Policy S3, Final Paragraph: Small scale, largely open form of infrastructure such as...outdoor sport and recreation facilities...are not considered to be inappropriate development on the Green Belt.

provision would not be provided within the required timescale. On this basis, we do not consider that infrastructure provision will have a bearing on this site's contribution to the housing trajectory.

Question 18. Are there any other constraints on the delivery of strategic infrastructure?

55. None in so far as North St Albans is concerned.

Question 19. 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?

56. We do not have any comment on this question.

Question 20. 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 Report Final Draft – November 2017 (INFR 009), submitted on Friday 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?

57. In the main this question is directed at the District Council however Hallam Land Management and St Albans School consider that the viability assessment for the North St Albans Broad Location is appropriate and there are no prohibitive costs that would preclude development in the manner envisaged by Policy S6 (vi).

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