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

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.

1. Question 1

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

- 1.1. The Council has previously set out the process for selecting the Broad Locations as part of the Green Belt Topic Paper (ED25C). As set out in ED25C:
 - 1.8 ... The second stage is set out by the Inspectors as: "Stage 2 then determines which sites would best meet the identified need having regard to Green Belt harm and other relevant considerations including whether they are suitably located and developable. All these factors are then considered to reach a conclusion as to whether exceptional circumstances exist for each of the individual Green Belt releases."
 - 1.9 This stage was undertaken through the independent SKM Green Belt Review (Part 1 2013 (Doc <u>GB004</u>) and Part 2 (Doc <u>GB001</u>) 2014, the <u>Strategic Site Selection work</u> (2018) and the Sustainability Appraisal (SA Working Notes and SA Report 2018 (Doc <u>CD009</u>)). The SKM Stage 1 Green Belt Review work looked at every part of the Green Belt in the district and examined it in relation to Green Belt purposes. This was undertaken jointly with Dacorum and Welwyn & Hatfield Councils, taking a wide strategic view of the Green Belt. The SKM stage 2 work involved more detailed examination of potential boundaries and sites. Together this provided a robust baseline understanding of the nature and extent of harm to the Green Belt and effect on Green Belt objectives.
 - 1.10 The understanding of these issues was clear from the start of the draft LP process, as indicated below in extracts from the September 2017 Member Presentation and PPC September 2017 Report 'Local Plan Next Steps and Direction of Travel'.
 - 1.11 The Council undertook the <u>Strategic Site Selection work</u> (2018) to review the existing SKM identified sites and to seek further potential sites to make up the 'shortfall'. As indicated in more detail in extracts from the PPC March 2018 Report '<u>Local Plan</u> -

<u>Development Strategy and Draft Strategic Site Selection Process</u>' including at paragraph 4.5 below):

Stage 1

1. Green Belt Review evaluation will be undertaken on the basis of a judgement of impact on (i.e. 'damage' to) Green Belt purposes (taking account of the purposes defined in and considered in the relevant parcel assessment in the GBR). Sites are rated as 'higher impact', 'medium impact' or 'lower impact' (set out as Red Amber Green (RAG)). It is important to remember that the independent Green Belt Review set out that "All strategic parcels in the Green Belt, at least in part, clearly perform a key role". The assessment is a comparative one in the context of understanding relative impacts on the Green Belt. To achieve 'further consideration for development' the site must be evaluated as lower or medium impact (Green or Amber). Any Red rating (higher impact) will rule a site out for further consideration.

Stage 2

- 2. Suitability will set out as (Red Amber Green) if there are any issues which are overriding constraints to development eg Access, Transport, Heritage, Biodiversity, Flood Risk. Any Red rating will rule a site out for further consideration.
- 3. Availability will set out as (Red Amber Green) if there are any issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc. Any Red rating will rule a site out for further consideration.

Stage 3

- 4. Unique contribution to improve public services and facilities, e.g. public transport (set out as Red Amber Green). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale
- 5. Unique contribution to enhancing local high quality job opportunities and the aspirations of the Hertfordshire Local Economic Partnership / Hertfordshire EnviroTech Enterprise Zone (set out as Green Amber Red). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale.
- 6. Unique contribution to other infrastructure provision or community benefits (set out as Red Amber Green). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale
- 7. Deliverable / Achievable is there is a reasonable prospect that the development, including all key aspects (including viability) being assessed as part of the overall 'package' proposed, is viable and deliverable (set out as Red Amber Green). Any Red rating will rule a site out for further consideration.
- 8. An overall evaluation judgement will be recorded (set out as Red Amber Green) as how the site is evaluated for further consideration for development in the Plan.

- 1.12 This work resulted in the 8 strategic sub-areas considered in the Green Belt Review Sites and Boundaries Study for St Albans (February 2014) (GB001) being judged as 8 'Green' (low impact) rated sites (the ninth site being the wholly employment providing site at East Hemel Central) and four additional 'Amber' (medium impact) rated sites. When reviewing the non-GB capacity in more detail (LP Appendix 2), all 8 of the 'Green' and three of the four 'Amber' sites were required to meet the 'standard methodology' figures for housing 'need'. The advantages of the three selected 'Amber' sites were considered by PPC to be greater than that for the nonselected fourth site.
- 1.13 As indicated in more detail in extracts from the <u>SA Working Note</u> (May 2018) quoted below:

Seventy sites capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land were considered at Stage 1, and of these 12 received either a Green or Amber rating and passed through to Stage 2. At Stage 2 all those 12 sites received a Green rating in relation to 'suitability' and 'availability' and passed through to Stage 3. At the end of Stage 3 the evaluation forms concluded that 8 of the 12 sites had 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 and East St Albans. The evaluation forms concluded that the remaining 4 sites had an overall evaluation of Amber. These sites are South East Hemel Hempstead, North Hemel Hempstead, the Former Radlett Aerodrome (Park Street Garden Village) and North East Redbourn.

. . .

Of the 12 potential (Green / Amber rated) Broad Locations considered in detail, 11 were selected for inclusion in the Publication Draft Local Plan. The one Broad Location which was not taken forward was North East of Redbourn. This was because the advantages of the other three sites which had received an Amber rating in the Council's Strategic Site Selection process were considered to be greater than those for North East of Redbourn.

1.14 It can be noted there was a further testing of potential alternative approaches indicated in more detail in extracts from the June 2018 PPC Report '<u>Draft Local Plan for Publication (Regulation 19 Stage) Consultation - Recommendation to June Cabinet – Appendix 1</u>' below):

Alternative housing development strategy options and effects of different strategies tested against the current proposed strategy Currently, other strategy options are:—

- 1) North East Redbourn Amber rated
- - -
- 2) Using Red rated sites

• • •

3) Different delivery trajectories

. . .

4) Other LPAs delivering development

. . .

5) Neighbourhood Plans

- 6) Development of a number of smaller sites currently in the Green Belt
- 1.15 The draft SA Working Note was considered by PPC and Cabinet in June 2018. The finalised SA report accompanied the LP Reg 19 consultation in September October 2018. It set out:

4.4.3 Planning Policy Committee (PPC) meeting 12th June 2018 – Park Street Garden Village Broad Location Re-evaluation

In relation to the Park Street Garden Village Broad Location, following the overall site selection process and the findings, the Council undertook a re-evaluation to look more specifically at the relative importance and merits of using the site either for housing or as a Strategic Rail Freight Interchange6. This has some general relevance for the selection of Local Plan Broad Locations for housing, as the re-evaluation looked at six alternative strategies for delivering elsewhere the level of housing that could be delivered at Park Street Garden Village. These alternative strategy options were as follows: North East Redbourn; Using Red rated sites; Different delivery trajectories; Other LPAs delivering development; Neighbourhood Plans; and Development of a number of smaller sites currently in the Green Belt.

St Albans Planning Policy Committee meeting 12th June 2018. Agenda Item 10. http://stalbans.moderngov.co.uk/documents/s50035482/PPC%20June%2020 https://stalbans.moderngov.co.uk/documents/s50035482/PPC%20June%2020 <a href="https://stalbans.moderngov.co.uk/documents/s50035482/PPC%20June%2020 <a href="https://stalbans.moderngov.co.uk/documents/s50035482/PPC%

Of these six alternative strategies, five were not considered by the Council to be reasonable alternatives because they involved reliance on development that was contrary to the strategy set for the plan (minimisation of adverse impacts on Green Belt purposes (Green Belt review led) and / or greater dispersal of development, with less favourable outcomes for community benefits and infrastructure improvement. They were therefore not subject to SA. The one exception was the site/alternative strategy option to develop the site at North East Redbourn Broad Location which had previously been considered to be a reasonable alternative in the wider context of the Local Plan site evaluation process and had therefore been subject to SA alongside the 11 other 'Green' and 'Amber' rated sites (see Section 4.4.3). However, as noted above the advantages of the other sites were considered to be greater than those for North East of Redbourn. Additionally, in relation to the particular consideration of that site being an alternative to Park Street Garden Village, the Council considered that the North East Redbourn option would not deliver the equivalent quantum of housing development required 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.

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1.24 In taking forward the current draft LP, the Council decided that only strategic scale Green Belt sites – as Broad Locations - would be taken forward. In the context of potential Green Belt release, the advantages of strategic scale sites over smaller ones was an explicit evaluative choice made by the Council. The consideration was based on a judgment that the strategic scale sites offer infrastructure and community benefits in a way that small sites do not (for example, all of the Broad Locations in the draft LP will be providing at least one school within the Broad Location).

1.25 As set out explicitly in the May 2018 PPC Questions and Answers

The draft Plan process is clearly based on identification of strategic level sites in the Green belt (see Planning Policy Committee papers Item 10. - para 4.4 in particular). This is an appropriate approach to Green Belt review and release, bearing in mind 'exceptional circumstances' need to be demonstrated in order to justify any change to GB boundaries. More than sufficient provision to meet 'need' has been identified. Small sites in the Green Belt submitted through the call for sites have not been needed or assessed. Further Green Belt small site opportunities will be available through policies set out in the LP (eg rural exception sites) and through Neighbourhood Plans.

The NPPF revision (at draft / consultation stage only) referred to does not set out that 'small site' locations need be in the Green Belt.

1.26 As set out in more detail in extracts from the June 2018 PPC Report '<u>Draft Local Plan</u> for Publication (Regulation 19 Stage) Consultation - Recommendation to June Cabinet' at Appendix 1 below):

Identification of sufficient smaller sites would unacceptably spread the adverse impacts of development on Green Belt purposes. It would also prevent the Plan maximising the infrastructure and community benefits that will arise only from larger scale urban extensions. The Local Plan Development Strategy clearly sets out to achieve a range of socio – economic benefits and this arises particularly from larger sites that are likely to provide a range of services and facilities that will benefit the whole community, not just new residents.

- 1.27 It is also important to note that, as set out in the May 2018 PPC Answer above, the Council also made explicit that further opportunities exist for these smaller scale areas of land identified in the wider study (<u>GB004</u>) through Neighbourhood Plans or through draft LP Policy L4 Affordable housing development in the Green Belt (rural exception sites).
- 1.2. The main evidence documents produced to inform the selection of the Broad Locations were:
 - GB004 Green Belt Review Purposes Assessment
 - GB001 Green Belt Review Sites & Boundaries Study
 - Local Plan Draft Strategic Site Selection Evaluation Outcomes (12 June 2018 PPC)
 - Local Plan Next Steps and Direction of Travel (12 September PPC)
 - PPC Questions and Answers May 2018
 - <u>Draft Local Plan for Publication (Regulation 19 Stage) Consultation Recommendation</u> to June Cabinet (12 June 2018)
 - CD 009 St Albans Local Plan Publication Sustainability Appraisal Report
 - St Albans Local Plan Sustainability Appraisal Working Note (7 November 2017)

2. 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?

- Yes. As in part set out in response to Matter 6 Question 1, high level assessments of all these categories have been undertaken at two or more stages of preparation of the Plan. In particular, the two stages of most relevance have been: as part of the <u>Strategic Site</u> <u>Selection work (2018)</u>; and as part of the SA process which considered potential impacts for the Broad Locations for categories of assessment.
- 2.2 In simple terms, assessments have been carried out for the Broad Locations for these categories within the following evidence work:

Landscape

St Albans Landscape Character Assessment -

https://www.hertfordshire.gov.uk/services/recycling-waste-and-

<u>environment/landscape/landscape-character-assessment.aspx</u>

The Green Belt Review (documents GB001-004)

Strategic Site Selection work (2018)

SHLAA work

SA Working Notes and SA Report 2018 (CD009)

Agricultural land

SHLAA work

Strategic Site Selection work (2018)

SA Working Notes and SA Report 2018 (CD009)

Flood-risk

SFRA and Water Cycle Studies -

SHLAA work

Strategic Site Selection work (2018)

SA Working Notes and SA Report 2018 (CD009)

Natural heritage

St Albans Landscape Character Assessment -

https://www.hertfordshire.gov.uk/services/recycling-waste-and-

environment/landscape/landscape-character-assessment.aspx

Strategic Site Selection work (2018)

SA Working Notes and SA Report 2018 (CD009)

Heritage

SHLAA work (SHLAA 2018 and earlier iterations)—
The Green Belt Review (documents GB001-004)
Strategic Site Selection work (2018)
SA Working Notes and SA Report 2018 (CD009)

3. Question 3

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

3.1 Yes the Council considers that the Sustainability Appraisal of the options for the Broad Locations is robust. The Self-Assessment of Soundness and Legal Compliance of the Plan 2019 (CD 025) is directly relevant; please see pages 35-36, page 66 and page 70 which are replicated below.

Possible Evidence Soundness Test and Key Evidence Provided Requirements Alternatives Plan alternatives have Reports and consultation been considered at documents produced in the early Can it be shown that the LPA's stages setting out how alternatives several levels. chosen approach is the most were developed and evaluated. appropriate given the reasonable and the reasons for selecting the Taking an overview of alternatives? Have the the whole Plan preferred strategy, and reasons for reasonable alternatives been rejecting the alternatives. This preparation process considered and is there a clear should include options covering not and initial consultation audit trail showing how and why just the spatial strategy, but also under Regulation 18, the preferred approach was the quantum of development, alternatives strategies arrived at? Where a balance had for accommodating strategic policies and development to be struck in taking decisions management policies. different levels of between competing alternatives, development have been considered. This is it clear how and why the An audit trail of how the evidence decisions were taken? Does the base, consultation and SA have is explained in the sustainability appraisal show how Regulation 22 influenced the plan. the different options perform and statement and SA is it clear that sustainability Reports. For the more Sections of the SA Report showing considerations informed the recent stages of the the assessment of options and content of the DPD from the Plan process the alternatives. alternative levels of start? development that could • Reports on how decisions on the be planned for and inclusion of policy were made. alternative development site and • Sections of the consultation development strategy document demonstrating how (of site / locations options were developed and combination) options appraised. were considered. They were evaluated on the Any other documentation showing basis of the Green Belt how alternatives were developed Review and NPPF SD and evaluated, including a report principles. The on how sustainability appraisal has evaluation was influenced the choice of strategy integrated with the and the content of policies.

independent SA.

Activity	Statutory requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
1. Are you preparing reasonable alternatives for evaluation during the preparation of the DPD?	Regulation 12 (2) of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633	NPPF para 35 SEA Guide, Chapter 5	The sustainability appraisal report and supporting documents relevant to the preparation of the DPD are part of the proposed submission documents (see Regulation 17).	Documents supporting decisions on alternatives and any preferred strategy.	Yes, preferred alternative options have formed part of the process throughout plan preparation. Regulation 22 Statement sets out the decision making process, including relevant planning policy committee reports.
9. Have you undertaken the sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?	The Act section 19(5) Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633	NPPF para 32 SEA Guide, Chapter 5	Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633 sets out the consultation procedures.	i. Reports on the sustainability of alternatives ii. Record of work undertaken on sustainability appraisal iii. Supporting documents	Yes, the SA included alternatives. Also see paragraph 1.6 of the LP.

3.2 Relevant evidence can primarily be found in St Albans Local Plan Sustainability Appraisal Report 2018 (CD 009). While consideration of options for broad locations has been undertaken over a period of time, some of the most relevant sections from the SA are set out below, which followed after the Call For Sites in 2018 and built on previous work.

4.4.2 Options for Housing Number and Broad Locations SA Working Note – May 2018

...

In relation to the Broad Locations the assessment considered 12 potential locations. These locations were those were identified as potential Broad Locations following the Council's three stage Site Selection Evaluation process. That process used a Red Amber Green (RAG) system to assess sites against three stages and eight criteria as follows:

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

Seventy sites capable of accommodating residential development of a minimum of circa 500 dwellings or 14 hectares of developable land were considered at Stage 1, and of these 12 received either a Green or Amber rating and passed through to Stage 2. At Stage 2 all those 12 sites received a Green rating in relation to 'suitability' and 'availability' and passed through to Stage 3.

At the end of Stage 3 the evaluation forms concluded that 8 of the 12 sites had 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 and East St Albans.

The evaluation forms concluded that the remaining 4 sites had an overall evaluation of Amber. These sites are South East Hemel Hempstead, North Hemel Hempstead, the Former Radlett Aerodrome (Park Street Garden Village) and North East Redbourn.

The findings of the assessments of these 12 sites are summarised in Table 4-4. The detailed assessment for each site is provided in Appendix E12

i avie 4-4	4-4: Summary of Assessments of Broad Location Options SA Objectives																			
Option	1. Biodiversity	2. Water resources		4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	 Crime and Fear of Crime 	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Lown Centres
East Hemel	X			V	1		1	~	J1	- 1	X	1		- 1				,, ,		
Hempstead (North)	1	-	-	хх	х	-	x	x	1	?	1	?	11	/	11	/	-	1	/	1
East Hemel Hempstead (South)	x	-	_	<i>x</i>	x	-	×	x	1	?	X V	?	11	1	11	1	-	1	/	1
South East Hemel Hempstead	x	-	_	<i>x</i>	×	_	×	х	1	?	X	?	1	1	11	1	-	1	\ \	1
North Hemel		_	_	х	/		/		/	2	х	/	/	1	11	·	_	✓	1	1
Hempstead	X	_	Ĺ	?	X	-	X	х		?	/	?	,	*	•	•	_	•	•	•
East St Albans	×	-	x	хх	x	-	x	x	?	?	x ×	?	~	11	11	1	-	~	/	1
North St Albans	х	-	-	хх	x	-	×	x	~	-	×	~	~	~	11	-	-	~	~	~
North West Harpenden	x	-	_	<i>x</i>	×	-	×	x	~	?	X	~	/	~	11	-	-	~	1	1
North East Harpenden	x	-	?	x ?	×	-	×	х	1	-	X	?	/	~	11	-	_	1	-	~
West of London	x	_	x	х	1	_	×	x	?	x	x	·	/	1	/	~	_	/		1
Colney West of Chiswell	^		^	? x	X		^	^	r	^	X	?	-	ĺ						
Green	x	-	-	?	x	_	x	x	~	-	~	~	/	1	~	-	-	~	-	1
Park Street Garden Village	X V	-	x	<i>x</i>	×	-	×	?	1	?	X V	?	1	1	11	1	-	1	\	1
North East of Redbourn	х	-	x	<i>x</i>	×	-	×	x	~	х	X	?	-	/	11	-	-	~	•	/

.....Of the 12 potential (Green / Amber rated) Broad Locations considered in detail, 11 were selected for inclusion in the Publication Draft Local Plan. The one Broad Location which was not taken forward was North East of Redbourn. This was because the advantages of the other three sites which had received an Amber rating in the Council's Strategic Site Selection process were considered to be greater than those for North East of Redbourn.

4.4.3 Planning Policy Committee (PPC) meeting 12th June 2018 - Park Street Garden Village Broad Location Re-evaluation

In relation to the Park Street Garden Village Broad Location, following the overall site selection process and the findings, the Council undertook a re-evaluation to look more specifically at the relative importance and merits of using the site either for housing or as a Strategic Rail Freight Interchange. This has some general relevance for the selection of Local Plan Broad Locations for housing, as the re-evaluation looked at six alternative strategies for delivering elsewhere the level of housing that could be delivered at Park Street Garden Village. These alternative strategy options were as follows: North East Redbourn; Using Red rated sites; Different delivery trajectories; Other LPAs delivering development; Neighbourhood Plans; and Development of a number of smaller sites currently in the Green Belt.

Of these six alternative strategies, five were not considered by the Council to be reasonable alternatives because they involved reliance on development that was contrary to the strategy set for the plan (minimisation of adverse impacts on Green Belt purposes (Green Belt review led) and / or greater dispersal of development, with less favourable outcomes for community benefits and infrastructure improvement. They were therefore not subject to SA. The one exception was the site/alternative strategy option to develop the site at North East Redbourn Broad Location which had previously been considered to be a reasonable alternative in the wider context of the Local Plan site evaluation process and had therefore been subject to SA alongside the 11 other 'Green' and 'Amber' rated sites... However, as noted above the advantages of the other sites were considered to be greater than those for North East of Redbourn. Additionally, in relation to the particular consideration of that site being an alternative to Park Street Garden Village, the Council considered that the North East Redbourn option would not deliver the equivalent quantum of housing development required 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.

4.5 Summary of the consideration of alternatives

As described in Sections 4.2 to 4.4 there has been extensive and detailed consideration of options throughout the development of the Local Plan, including that for the Strategic Local Plan (formerly Core Strategy). The sustainability appraisal has provided continual input into this process, through helping to develop and refine options and emerging policies and by reporting the findings of the assessments undertaken at each stage of the plan making process. These assessments have provided the decision makers with information on the likely sustainability implications of pursuing one option over another and have therefore been an important part of both the evidence base and the decision making process itself, when deciding the preferred options for including in the Plan.

It should be noted however that the reasons for taking forward some options and rejecting others are not restricted to the findings of the sustainability appraisal but also cover wider planning issues such as deliverability, views of the local community and infrastructure availability/constraints. The findings of the technical studies undertaken by SADC on the potential Broad Locations are an example of such an influencing factor for selecting preferred options and rejecting others.

Due to the change in planning context and the 'passage of time' some of the options considered at the earlier stages during the development of the SLP and Local Plan can no longer be considered as reasonable alternatives. For example some of the locations considered for inclusion in the Plan have already been developed or granted planning permission, whilst others have a limited capacity which falls below the criterion for a Broad Location that does not make them appropriate for inclusion in the Local Plan.

Conversely, the change in context that resulted from the publication of the NPPF (as described in Section 4.2.6) has meant that some of the options that were previously rejected have now been reconsidered as being reasonable alternatives to deliver the strategy. This is the case for some Broad Locations which have been brought back into consideration given the significantly higher level of growth that is now proposed when compared to the Core Strategy that was consulted on in December 2010. In addition, the further technical work that has been undertaken has meant that the relative performance of Broad Locations may have changed over time and this may have influenced the selection of one option over another when considering which broad location to include in the Plan.

The options that have been selected for inclusion in the Publication Local Plan are those that are considered to be the most appropriate, based on studies and assessments, to deliver the objectives of the Plan, whilst the options that have not been taken forward are those that have not performed as well against the criteria in the studies and assessments that have been undertaken to inform the development of the Plan.

Assessments for the preferred options that have been taken forward into the Publication Local Plan are included in Appendix F, whilst Appendix E provides summaries of the assessments of those options that are not included in the Publication Local Plan.

4. Question 4

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

4.1 Yes, the Council considers that the Broad Locations have been adequately identified as set out in detail on the Policies Map, (CD003). The Council considers that they have been sufficiently clearly defined. It may be helpful to note that CD003 has been created in a version of the pdf format that allows a high degree of 'zoom' or expansion and provides clarity at what the Council considers is a reasonable level of detail. Once adopted, the Plan would also be translated into GIS systems at a high degree of resolution.

5. Question 5

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

- Overall, the Masterplans for the first tranche of Broad Locations are well underway and clear processes are in place for later tranches. The Masterplans are being progressed alongside the Local Plan. Several Planning Performance Agreements (PPAs) to take forward the Masterplan (and subsequent planning applications) have been signed between, variously SADC, DBC, HCC and landowner/developer teams in order to embed the necessary officer and consultant resources. Following the direction in the Plan, a Strategic Sites Masterplanning Toolkit (SSMT) was agreed at PPC in July 2019 here to create further certainty around the Masterplanning processes.
- 5.2 Policy S6 sets out that planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders. The SSMT has taken this forward to create certainty for all parties about the process and to deliver the excellence that the Plan require. The SSMT sets out, in brief:
 - What outputs the Council is seeking from the Masterplan and later planning processes in Broad Locations. This includes how they will seek to secure high quality, sustainability and delivery of infrastructure throughout that process.
 - That the Council will lead the engagement with the community and what the stages of community and stakeholder engagement will be during the Masterplanning process.
 This will likely include using expert community engagement specialists on the Council's behalf
 - What the Masterplan document is going to include.
 - What design controls the Council will seek from the Masterplan and later planning processes to facilitate the LP's requirement for excellence in design, energy efficiency and water management within Broad Locations. This includes the proposal to set up a St Albans Design Review Panel (see a separate report on this Agenda).
 - That the Council will put emphasis on considering place stewardship in the form of meaningful community-run and appropriately-funded management organisations for developments within Broad Locations.
- 5.3 A sample program is shown at M6Q5 Appendix 1.
- 5.4 In more detail, significant progress has been made in particular with regard to the East Hemel Hempstead (North, Central and South), North St Albans and North West Harpenden Masterplans. PPAs have been agreed covering all 5 of these Broad Locations, comprising the 'first tranche' of Masterplans. Parties to the PPA for East Hemel are SADC, DBC, HCC and the landowner/ developer team (Crown Estate). For North St Albans and

North West Harpenden the PPA parties are SADC, HCC and the landowner/ developer team. A PPA for East St Albans is already under discussion and is scheduled to be in place with SADC, HCC and the landowner / developer team by spring 2020.

5.5 Having put additional resources in place (in SADC, DBC, HCC and landowner / developer teams respectively) in order to take forward both the SSMT and then the Masterplans, significant progress has been made.

East Hemel Hempstead (North, Central and South)

- PPA agreed in draft July 2019 and signed August 2019.
- Building on earlier work, PPA Workshops started August 2019 and have so far looked at visioning, spatial vision, scale, employment zone, S106 / Infrastructure, transport.
- Design Review Panel in December 2019
- Further workshops post Design Review Panel in December.
- Hemel Garden Communities Members Briefing 8th October 2019.
- Members briefing for East Hemel Hempstead 5th November 2019.

North West Harpenden

- PPA agreed in draft July 2019 and signed September 2019
- Building on earlier work, PPA Workshops started August 2019 and have so far looked at landscape, heritage, transport; workshops booked for parameter plans and masterplan document.
- Member Briefing for North West Harpenden 21th October 2019.
- Design Review Panel, 20th November 2019

East St Albans

- Part of this Broad Location is already being built out as part of permission 5/2013/2589 for 348 homes.
- Discussions underway to prepare to start the Masterplanning PPA process spring 2020.

North St Albans

- PPA agreed in draft December 2019.
- Building on earlier work, PPA Workshops started July 2019 and have so far looked at visioning, transport, landscape and preferred options appraisal.
- Members briefing for North St Albans 21 October 2019.
- 5.6 West of Chiswell Green, Park Street Garden Village, Land West of London Colney and North East Harpenden are in the earlier stages of the Masterplanning process, (reflecting their later positioning in the housing trajectory). Given the successful progress with the SSMT and the PPAs and Masterplans for East Hemel, North St Albans and North West Harpenden; and the smaller scale of these Broad Locations, these may well come forward earlier than currently indicated in the Plan housing trajectory at Appendix 2.

5.7	Statements of Common Ground (SoCGs) for the Broad Locations have been discussed with the landowner / developer teams in November / December 2019 and can be seen at M6Q5 Appendix 2.	

6. Question 6

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

- No, the Council considers that the current approach in the Plan is the most robust, effective and appropriate one. There are distinct characteristics of both the land itself and the requirements of the development on it for the four different areas and correspondingly the four different Broad Locations. This view (of distinct areas) was initially formed by the independent consultants SKM when they conducted the Green Belt Review in 2013-14 and has been the Council's consistent view, based on the evidence. The approach is considered to aid the detailed comprehension of each Broad Location and to provide extra clarity and certainty to all parties. For example, the nature and focus of East Hemel Hempstead (North) is about delivering the homes, the secondary school and the country park; whereas East Hemel Hempstead (Central) is focussed on providing very significant levels of employment land within the Hertfordshire Enviro-tech Enterprise Zone and it needs to more directly take into account additional constraints such as the Buncefield oil depot.
- As set out in detail in response to earlier Matters, the Council is directly taking account of the totality of the four Broad Locations within the Plan and also a broadly similar scale of development coming forward within Dacorum's emerging Local Plan. This is as part of the extensive cooperation and collaboration between SADC, DBC, HCC, Herts LEP, Highways England, the Crown Estate and others as part of Hemel Garden Communities (HGC). The Council considers that it is sound and required to take full account of the totality of the four Broad Locations and also the merging development proposals within Dacorum and it has done so. However the Council does not consider that the most effective way to do this, directly in terms of this Plan at this time, is through a single Broad Location policy approach.

7. **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?

- 7.1 Yes, the Council has considered the advice set out in paragraphs 72 a-d of the NPPF and considers that the approach set out in the Plan fully accords with these paragraphs, in the District's context. As set out in detail in the Green Belt Topic Paper (ED 25C), potential allocation of large sites as Broad Locations has been considered over a substantial period of time. The specific content of NPPF paragraphs 72 a-d did not exist until July 2018, after the Council took the decision to proceed to the Plan Regulation 19 publication. However, the updated NPPF text was similar to that in the draft NPPF (2018) which had been reported to PPC during the Plan's development and the final NPPF text was reported to PPC in September 2018. All of the NPPF and PPG updates were further considered by PPC in March 2019. The detail of the content of NPPF paragraph 72a-d is considered to be essentially an explicit form of words to express the Government's specific view in relation to what are essentially enduring good planning principles, when considering development at scale. The Council considers that it is therefore no surprise that the process and evidence for the Plan over a long period has followed such a course; even though the detail of the wording to be addressed in NPPF paragraphs 72 a-d only appeared in July 2018.
- 7.2 NPPF paragraph 72 sets out at a-d:
 - consider the opportunities presented by existing or planned investment in a) infrastructure, the area's economic potential and the scope for net environmental gains;
 - ensure that their size and location will support a sustainable community, with sufficient b) access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
 - set clear expectations for the quality of the development and how this can be c) maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;
 - d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)
- 7.3 The majority of the consideration of the substantive elements of paragraphs 72 a-b was through the Strategic Site Selection work (2018). Stages 2 and 3 of that work, as set out in the PPC March 2018 Report - 'Local Plan - Development Strategy and Draft Strategic Site Selection Process' sets out at paragraph 4.5, includes:

Stage 2

- 2. Suitability will set out as (Red Amber Green) if there are any issues which are overriding constraints to development eg Access, Transport, Heritage, Biodiversity, Flood Risk. Any Red rating will rule a site out for further consideration.
- 3. Availability will set out as (Red Amber Green) if there are any issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc. Any Red rating will rule a site out for further consideration.

Stage 3

- 4. Unique contribution to improve public services and facilities, e.g. public transport (set out as Red Amber Green). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale
- 5. Unique contribution to enhancing local high quality job opportunities and the aspirations of the Hertfordshire Local Economic Partnership / Hertfordshire EnviroTech Enterprise Zone (set out as Green Amber Red). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale.
- 6. Unique contribution to other infrastructure provision or community benefits (set out as Red Amber Green). Any Green rating is considered to be potentially significantly positive at a District wide (or even wider) scale
- 7.4 The majority of the substantive delivery of the key aspects of paragraph 72 a-d has been addressed through the Plan in policies S6 including S6i-xi, as well as Appendix 2, the Housing Trajectory. For example, clear expectations for the quality of development and how they will be maintained is embedded in the Council-led Masterplanning process and the required Community Management Organisations set out in S6. The Housing Trajectory at Appendix 2 make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites. This is addressed in more detail in response to Matter 8 Questions. East and North Hemel is a good example of where the Council has identified an opportunity "for supporting rapid implementation" via the successful bid for HGC Garden Community status and the ensuing support in particular from MHCLG and Homes England.
- 7.5 The Council considers that the broad locations take advantage of opportunities in respect of infrastructure, economic potential and environmental gains. As set out in the strategic site evaluations presented to Planning Policy Committee May 2018, the Broad Locations are considered to best take advantage of this opportunities.
 - "b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities with the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which the access is good"
- 7.6 As set out the Green Belt Review, and Planning Policy Committee site evaluations, the Broad Locations are considered to be in appropriate locations to support sustainable communities.
 - "c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided"
- 7.7 In the Policy S6 requirements and the design led Masterplanning process for the Broad Locations, the Council has set out a clear expectation of the quality of the development and

- how this can be maintained. For the HGC Broad Locations (East and North Hemel), there is additionally now the HGC Charter (as referenced in response to other MIQs).
- 7.8 Policy S6 sets out that planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders. A Strategic Site Masterplanning Toolkit (SSMT) was developed in collaboration with the Council by a team representing landowners/developments within the site, and this was agreed at planning policy committee July 2019.
 - "d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations"
- 7.9 Realistic assumptions have been made as set out in LP Appendix 2. All of the landowner/developer submissions in summer 2018 supported the timescales set out therein. Further detail is also set out in response to Matter 8 Questions. It can be noted that the landowners/developers have supported the trajectory set out at Appendix 2 in the first tranche of Masterplans coming forward.

8. 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?

- 8.1 The strategic infrastructure necessary for the plan to be implemented has been set out in the Local Plan, IDP (INFR 001), including IDS at LP Appendix 4 (and at IDP Annex 1). Additional information regarding infrastructure can be found in SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) and IDP. Also see SADC response to M6 Q9.
- 8.2 Yes, the Council considers that the requirements are clearly set out in policies of the Plan, including in the IDS at Appendix 4 of the LP. There is also the IDS Update at Annex 1 of the IDP. A list of the main infrastructure types and Local Plan policy cross-references are shown below:

Infrastructure	Local Plan Policy X-Refs
Туре	Dell's 200's ' December of the December of
General	Policy S6i-xi – Broad Locations for Development
Practitioners	Policy L17 – Infrastructure
(GPs)	Policy L22 – Community, Leisure and Sports Facilities
Hospitals &	
Acute Health	
Provision	
Education	Policy S6i-xi – Broad Locations for Development
Infrastructure	Policy L17 – Infrastructure
Including: • Primary	Policy L21 – Education (see 'New Primary School for the St Albans Central Areas')
 Secondary Oaklands College Early Education and Child Care Provision 	Policy S6 v) – East St Albans Broad Location. To provide an urban extension of St Albans, improved and new education and training facilities, and to further integrate Oaklands College with the wider community. Further detail will be set out in the Local Plan with potential for a Planning Brief or Masterplan. Policy L22 – Community, Leisure and Sports Facilities. The Council supports the retention of existing community, leisure and sports buildings and facilities unless suitably re-provided elsewhere.
Sports and	Policy S6i-xi – Broad Locations for Development
Leisure	Policy L17 – Infrastructure
Facilities	Policy L22 – Community, Leisure and Sports Facilities.
	The Council supports retention of existing community, leisure and sports buildings and facilities unless suitably re-provided elsewhere.
	 Improvement to existing facilities through refurbishment or redevelopment. Facilities can be delivered as part of new educational development, where joint use facilities can be provided.
	 New facilities to be provided within broad locations.
	 The Council supports the principle of the development of a new stadium and training facilities for St Albans City Football Club
Library	New library facilities will not be required. Planning obligation or CIL contributions
Services	could be used to support improvements to existing facilities or replacement
	facilities.
	Policy L17 – Infrastructure
	retention of existing community, leisure and sports buildings and facilities unless
,	 Improvement to existing facilities through refurbishment or redevelopment Facilities can be delivered as part of new educational development, where joint use facilities can be provided. New facilities to be provided within broad locations. The Council supports the principle of the development of a new stadium a training facilities for St Albans City Football Club New library facilities will not be required. Planning obligation or CIL contributio could be used to support improvements to existing facilities or replacement facilities. Policy L17 – Infrastructure Policy L22 – Community, Leisure and Sports Facilities. The Council supports to

Cemeteries	Policy L17 – Infrastructure Policy L22 – Community, Leisure and Sports Facilities (see 'Cemeteries'). The Council needs to ensure provision of additional cemetery facilities over the lifetime of the LP. Expansion of the existing London Road, St Albans cemetery is allocated as the most sustainable way of providing additional capacity, as identified on the Policies Map.
Cultural	Play areas and smaller youth facilities can be delivered through new
Services – Youth Provision	developments. Larger facilities could be partially supported by developer contributions through planning obligations or CIL contributions. Policy L17 – Infrastructure
Trovidion	Policy L22 – Community, Leisure and Sports Facilities. The Council supports the retention of existing community, leisure and sports buildings and facilities unless suitably re-provided elsewhere.
Ctratagia	
Strategic Green Infrastructure	Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees sets out the importance of natural spaces, environments and green infrastructure across the District.
	Strategic Green Infrastructure provision will be required as part of the Broad Locations at: East Hemel Hempstead (North) (S6 i), East Hemel Hempstead (South) (S6 iii), North Hemel Hempstead (S6 iv), East St Albans (S6 v), North St Albans (S6 vi), North East Harpenden (S6 vii) and Park Street Garden Village (S6 xi).
	Policy S6 – Broad Locations for Development (see proposals for 'Strategic and local public open space' and 'Countryside access links')
	Policy S6 i) – East Hemel Hempstead (North) Broad Location (see proposals 7, 8, 9 and 17)
	Policy S6 iii) – East Hemel Hempstead (South) Broad Location (see proposals 8, 9, 10 and 17) Policy S6 iv) – North Hemel Hempstead Broad Location (see proposals 7, 8, 9
	and 16) Policy S6 v) – East St Albans Broad Location (see proposals 7 and 18)
	Policy S6 vi) – North St Albans Broad Location (see proposals 8 and 15) Policy S6 vii) – North East Harpenden Broad Location (see proposals 7 and 13) Policy S6 xi) – Park Street Garden Village Broad Location (see proposals 7, 8, 9 and 19)
	Policy L17 – Infrastructure
	Policy L28 – Green Space Standards and New Green Space Provision Policy L29 – Green and Blue Infrastructure, Countryside, Landscape and Trees
Local Green Infrastructure	Policy L29 Green and Blue Infrastructure, Countryside, Landscape and Trees sets out the importance of natural spaces, environments and green infrastructure across the District.
	Policy L26 Local Green Space will require the preservation, enhancement and creation of local green spaces throughout the District. New green space will be
	required in development of most Broad Locations (Policy S6). Policy S6 – Broad Locations for Development (see proposals for 'local public open space', 'public open space' or 'recreation space')
	Policy S6 i) – East Hemel Hempstead (North) Broad Location (see proposals 7, 10, 16 and 17)
	Policy S6 iii) – East Hemel Hempstead (South) Broad Location (see proposals 8, 11, 16 and 17) Policy S6 iv) – North Hemel Hempstead Broad Location (see proposals 7, 10, 15
	and 16) Policy S6 v) – East St Albans Broad Location (see proposals 7, 8, 17 and 18)
	Policy S6 vi) – North St Albans Broad Location (see proposals 8, 9, 14 and 15) Policy S6 vii) – North East Harpenden Broad Location (see proposals 7, 8, 9 and
	13) Policy S6 viii) – North West Harpenden Broad Location (see proposals 7, 8 and 13)
	Policy S6 ix) – West of London Colney Broad Location (see proposals 7, 8 and 12)
	Policy S6 x) – West of Chiswell Green Broad Location (see proposals 6, 7 and 11)

	Policy S6 xi) – Park Street Garden Village Broad Location (see proposals 7, 8, 10,
	18 and 19) Policy L17 – Infrastructure
	Policy L26
	Policy L27 – Green Space Not Designated as Local Green Space
	Policy L28 – Green Space Standards and New Green Space Provision
	Policy L29 – Green and Blue Infrastructure, Countryside, Landscape and Trees
Road Network	Policy S6 i-xi – Broad Locations for Development
Trodd Hollion	Policy L17 – Infrastructure
	Policy L18 – Transport Strategy builds on LTP4 and Urban Transport Plans to set
	out the identified transport issues, priorities and solutions in the District.
	Policy L19 – Highways / Access Considerations for New Development
Parking	Policy L17 – Infrastructure
	Policy L18 – Transport Strategy
	Policy L20 – New Development Parking Guidance and Standards
	LP Appendix 1 – New Development Parking Guidance and Standards
Rail Network	Development proposals will not be of a sufficient scale to provide strategic rail
	improvements.
	Policy S6 xi – Broad Locations for Development
	Abbey line proposals and Park & Rail at PSGV Broad Location. Delivered by
	developers and/or via CIL or developer contributions. Exploration of other rail
	related possibilities.
	Policy L17 – Infrastructure
	Policy L18 – Transport Strategy works in conjunction with LTP4 and Urban
	Transport Plans to set out the identified transport issues, priorities and solutions in
Dua Mahuari	the District
Bus Network	Development proposals at the Broad Locations are of a sufficient scale to support
	bus improvements.
	Policy S6 i-xi – Broad Locations for Development. Also includes reference to
	multimodal interchange in association with S6 ii.
	Policy L17 – Infrastructure
	Policy L18 – Transport Strategy builds on LTP4 and Urban Transport Plans to set
	out the identified transport issues, priorities and solutions in the District.
Walking and	Depending on the location and scale of development, proposals may be able to
Cycling	provide required sustainable transport improvements either in kind or through
Infrastructure	planning obligations.
	Development proposals at the Broad Locations are of a sufficient scale to support
	new infrastructure and/or improvements to existing.
	Policy S6 i-xi – Broad Locations for Development
	Policy L17 – Infrastructure
	Policy L18 – Transport Strategy sets out that the Council supports measures
	which ensure the free flow of traffic, reduce traffic congestion and encourage
	more sustainable travel, by public transport, walking and cycling. Various required
Water	improvements are set out in the policy.
	Policy S6 – Broad Locations for Development (see proposals on 'water management' in Policies: S6 i, S6 iii, S6 iv, S6 v, S6 vi, S6 vii, S6 viii, S6 ix, S6 x
Infrastructure	management in Policies: 56 i, 56 iii, 56 iv, 56 v, 56 vi, 56 vii, 56 viii, 56 ix, 56 x
	And So xi) Policy L17 – Infrastructure (see 'Utility Infrastructure')
	Policy L23 – Urban Design and Layout for New Development (see 'Detailed
	design and layout', paragraph C 'Drainage')
	Policy L25 – Energy and Environmental Performance of New Development (see
	'Design of development for environmental performance', paragraph seven)
	Policy L29 – Green and Blue Infrastructure, Countryside, Landscape and Trees
	, 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	Note: The water provider has a duty to supply water to all development.
	New dwellings will be required to meet higher standard (building regulation) Code
	for Sustainable Homes water usage efficiency targets.

Energy Distribution	Policy S6 – Broad Locations for Development (see proposals on 'energy efficiency' and 'renewable energy production and supply' in policies: S6 i, S6 iii, S6 iv, S6 v, S6 vi, S6 vii, S6 viii, S6 ix, S6 x and S6 xi) Policy S6 ii) – East Hemel Hempstead (Central) Broad Location (see proposal 11) Policy S6 v) – East St Albans Broad Location (see proposal 20) Policy L17 – Infrastructure (see 'Utility Infrastructure') Policy L20 – New Development Parking Guidance and Standards (see 'Parking Standards: General Requirements', General Requirement eleven) Policy L25 – Energy and Environmental Performance of New Development Note: It is the responsibility of the developer to engage with consultants to determine their load requirements and determine the connection to the electricity
Divital	and gas networks.
Digital Infrastructure	Policy L9 – Primarily Business Use Areas (see paragraph five and paragraph six) Policy L17 – Infrastructure (see 'Utility Infrastructure' and 'Planning for Broadband') Policy L18 Transport Strategy supports planning for superfast broadband
	infrastructure.
Waste	Paragraph 2.8 – Minerals and Waste
Infrastructure	Policy L9 – Primarily Business Use Areas (see paragraph one)
	Policy L17 – Infrastructure
	Policy L23 – Urban Design and Layout of New Development (see 'Detailed design and layout', paragraph g – 'Access, parking, garaging and servicing') Policy L25 – Energy and Environmental Performance of New Development (see
Health and	'Design of development for environmental performance', paragraph two)
Community	Policy S6i-xi – Broad Locations for Development Policy L2 – Provision of Older Persons Housing and Special Needs Housing
Services	Policy L3 – Provision of and Financial Contributions towards Affordable Housing Policy L8 – Primarily Residential Areas
5 "	Policy L17 – Infrastructure
Police	Policy L17 – Infrastructure
Services	Policy L23 – Urban Design and Layout of New Development says developments should create safe environments which address physical aspects of crime
	prevention.
Fire Services	Policy L17 – Infrastructure
Public Realm	Policy L13 – Attractive and vibrant cultural and civic areas. Cultural and civic
	areas will be enhanced and managed to create and encourage business,
	commercial, cultural and visitor activities which area focus of community activity
	and pride.
	Policy L17 – Infrastructure
	Policy L22 – Community, Leisure and Sports Facilities. The Council supports the retention of existing community, leisure and sports buildings and facilities unless
	suitably re-provided elsewhere.
	Policy L23 – Urban Design and Layout of New Development

9. 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.
- 9.1 Yes, the Council considers that it has adequately identified and costed the infrastructure requirements of the Broad Locations and other strategic infrastructure in line with the best available information, in a proportionate way. The main documents are: IDP (INFR 001) and the updated draft IDS (at INFR 001 IDP Annex 1, attached as M6Q9 Appendix 1 for ease of reference). Additional information can be found in the SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) and other INFR documents.
- 9.2 The IDP (INFR 001) sets out the Council's approach:

The IDP supports the LP and the Infrastructure Delivery Schedule (IDS) Update, which can be seen in Annex 1 of this report..... This forms the foundation from which further detailed infrastructure planning can be undertaken through site specific master planning exercises.

The IDP is a living document and progress against delivery will be reported annually in the Authority's Monitoring Report. The IDP is intended to be updated on a regular basis to reflect reviews of the Local Plan. Infrastructure requirements are likely to evolve over the Plan period, as a result of public sector policies and priorities, technological developments and the impacts of planned growth as it occurs. Subsequent versions will also take account of any further updates to the various plans and strategies of service providers. One particular area that will be developed and further explained as the IDP evolves is scheme definition / design and costings; particularly of key items of public, non-commercial, provider infrastructure. This is a topic currently being explored through early collaborative master planning work with landowner / developer interests on the Broad Locations. The IDP evidences this through illustrative background material incorporated in the appendices.

9.3 The CIL and Viability evidence demonstrates that both whole plan viability and strategic sites or broad locations are viable. The SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) concludes:

This testing demonstrates that the strategic site is viable and deliverable having regard to both the Council's planning policy requirements (including affordable housing and development specified in Policy S6... and the proposed Community Infrastructure Levy charging rates set out in BNPPRE's November 2017 CIL&LPVS.

9.4 The Self-Assessment of Soundness and Legal Compliance of the Plan 2019 (CD 025) confirms that work on IDP has been undertaken in an appropriate manner which meets requirements as set out at p37-38 and p59-60 and replicated below:

Soundness Test and Key Requirements	Possible Evidence	Possible Evidence
	 A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. Demonstrable planwide viability, particularly in relation to the delivery of affordable housing and the role of a CIL 	This is detailed in the LP Infrastructure Delivery Schedule (LP Appendix 4) and the Infrastructure Delivery Plan (IDP). The IDP has been prepared in parallel with the LP process. It is published at the point of submission to detail the current position on infrastructure planning work being undertaken by SADC and infrastructure providers. The IDP demonstrates the important LP infrastructure dependencies. The Plan is sound because the available evidence is that necessary infrastructure can be provided within the Plan period. CIL and Viability Report Final Draft 2017 (INFR 009)
policies?	schedule.	demonstrates planning wide viability in relation to the role of CIL and affordable housing.

Activity	Legal requirement	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
3. Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 18	NPPF para 16	NPPF paras 25 give examples of relevant bodies which should be consulted.	i. Consultation statement ii. Copies of documents consulting these people iii. Record of discussions	Work with landowners / developers is recorded in the Regulation 22 Statement and Duty to Cooperate. Further detailed engagement with those involved in the Broad Locations that are included in the LP is reported in papers of SADC Planning Policy Committee (PPC). These papers are publically

		accessible through the SADC website. Work with infrastructure providers is recorded in detail in the IDP in the
		Document Library

9.5 [a] Yes the Council has included infrastructure requirements of the broad locations and other strategic infrastructure requirements for road improvements. See IDP (INFR 001), principally from page 92-103 and the IDS. Additional information, including costing assumptions, can be found in SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019). Also see SADC response to M6 Q20c. For more information about road transport schemes, please see COMET LP4 SADC Analysis V4 Final (INFR Oct 2019). It should be noted that analysis of the transport model run to 2036 concludes at paragraph 7.1.1:

LP4 shows there are several areas of congestion and delay around SADC, however no obvious "showstoppers" where very long delays or high levels of congestion are recorded. Many of the junctions experiencing delays are currently known as congestion hotspots.

- 9.6 [b] Yes the Council has included infrastructure requirements of the broad locations and other strategic infrastructure requirements for public transport systems and sustainable transport networks. See IDP (INFR 001) principally at? page 105 and 114 and the IDS. Additional information, including costing assumptions, can be found in SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019). Also see the SADC response to M6 Q20c. For more information about the sustainable transport schemes, please see COMET LP4 SADC Analysis V4 Final (INFR Oct 2019), principally at pages 52-74.
- 9.7 [c] Yes the Council has included infrastructure requirements of the broad locations and other strategic infrastructure requirements for water supply and waste water treatment. See IDP (INFR 001), principally from page 124-130. It should be noted that the Hertfordshire Water Study 2017 HCC report (IDP appendix 47) para 5.2 sets out:
 - Confirmation that there is available water supply to support projected levels of growth in Hertfordshire in the current round of local plans.
 - That waste water treatment capacity is available to support current growth levels in Hertfordshire to 2031, but investment in capacity will be required to service growth beyond that period.
- 9.8 [d] Yes the Council has included infrastructure requirements of the broad locations and other strategic infrastructure requirements for electricity/gas and other services eg digital broadband. See IDP (INFR 001) from page 124, page 131 and page 140; and the IDS.
- 9.9 [e] Yes the Council has included infrastructure requirements of the broad locations and other strategic infrastructure requirements for primary healthcare. See IDP (INFR 001) principally from page 18-27 and the IDS. Additional information, including costing assumptions, can be found in SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019). Also see the SADC response to M6 Q20c.
- 9.10 [f] Yes the Council has included infrastructure requirements of the broad locations and other strategic infrastructure requirements for schools and early years' provision. See IDP (INFR

- 001) principally at pages 31, 39 and 42; and the IDS.. Additional information, including costing assumptions, can be found in SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019). Also see the SADC response to M6 Q20c. It is considered that primary school and secondary school provision, as shown in the IDS at IDP Annex 1, accords with HCC requirements as set out in their October 2018 representation to the Regulation 19 Publication Plan.
- 9.11 [g] Yes the Council has included infrastructure requirements of the broad locations and other strategic infrastructure requirements for green infrastructure. See IDP (<u>INFR 001</u>), principally from page 66-90; and the IDS. Additional information, including costing assumptions, can be found in SADC CIL LP Viability Strategic Site Testing (<u>INFR Sep 2019</u>). Also see the SADC response to M6 Q20c.
- 9.12 [h] Yes the Council has included infrastructure requirements of the broad locations and other strategic infrastructure requirements leisure and sports facilities. See IDP (INFR 001), principally at page 50 and 79.

Soundness Test and Key Requirements	Possible Evidence	Possible Evidence
Infrastructure Delivery Planning	A schedule setting out responsibilities for delivery,	This is detailed in the LP Infrastructure Delivery Schedule (LP Appendix 4)
 Have the infrastructure implications of the policies clearly been identified? 	mechanisms and timescales, and related to a CIL schedule where appropriate.	and the Infrastructure Delivery Plan (IDP). The IDP has been prepared in parallel with the LP process. It is published at the point of submission to
 Are the delivery mechanisms and timescales for implementation of the policies clearly identified? Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	 Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. Demonstrable planwide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	detail the current position on infrastructure planning work being undertaken by SADC and infrastructure providers. The IDP demonstrates the important LP infrastructure dependencies. The Plan is sound because the available evidence is that necessary infrastructure can be provided within the Plan period. CIL and Viability Report Final Draft 2017 (INFR 009) demonstrates planning wide viability in relation to the role of CIL and affordable housing.

Activity	Legal requiremen t	Guidance reference	Additional notes	Possible Evidence	(Possible) Evidence – outline points and references only
3. Are you	Regulation	NPPF	NPPF paras	iv. Consultation	Work with
engaging with	18	para 16	25 give	statement	landowners /
stakeholders			examples of	v. Copies of	developers is
responsible for			relevant	documents	recorded in the

delivery of the	bodies	consulting	Regulation 22
-			<u> </u>
strategy?	which	these people	Statement and Duty
	should be	vi. Record of	to Cooperate.
	consulted.	discussions	
			Further detailed
			engagement with
			those involved in
			the Broad Locations
			that are included in
			the LP is reported in
			papers of SADC
			Planning Policy
			Committee (PPC).
			These papers are
			publically
			accessible through
			the SADC website.
			Work with
			infrastructure
			providers is
			recorded in detail in
			the IDP in the
			Document Library

10. Question 10

Are any infrastructure requirements missing?

- 10.1 The Council considers that there are no significant infrastructure requirements missing. The infrastructure requirements as set out in the 2018-2019 Infrastructure Delivery Plan (INFR 001) and other INFR documents are considered to be as comprehensive as reasonably possible, based on the best available information, in a proportionate way; and there are no significant missing items of infrastructure.
- 10.2 It is acknowledged and the IDP recognises that there are limitations to the evidence, including those as set out below:
 - 4.1 A number of infrastructure service providers plan using shorter time frames than that used in the LP, such as on a 3 to 5 year cycle. Others, such as some of the utility providers, tend to adopt a reactive approach to growth, preferring to respond to specific, detailed proposals at the planning application stage. This has obvious limitations in terms of planning ahead within the Local Plan timeframe of 2036.
 - 4.2 Emphasis has therefore been on ensuring a detailed understanding of infrastructure requirements for early phases of plan delivery and the further work needed to inform requirements for later phases. In addition, the IDP has a role in encouraging and facilitating longer term planning, sometimes through joint studies and master planning work with landowners / developers and infrastructure providers. This is in line with the PPG as stated previously. Future updates of the IDP will be needed to inform the requirements for later phases. The IDP is intended to be updated on an as necessary / regular basis to respond to changes in circumstances and understanding.

11. 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?

- 11.1 Yes, the IDP (INFR 001) Annex 1: IDS sets out the main funding sources and key stakeholders at columns N & O. Further information is also set out in the IDP and the SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019). Overall and in brief, the new developments themselves will either directly provide or directly fund the infrastructure that is required in the next 5-7 years. The SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) takes the approach of using "a worst case scenario for the contributions......." The new draft IDS (INFR 001 Annex 1) takes the approach of estimating when infrastructure requirements would absolutely be needed at the latest by, which in many cases for the Broad Locations is not until after 5 years, but by 10 years from adoption of the Plan. As the Plan sets out with regard to the required Council-led Masterplanning, that process will refine when specific items of infrastructure will actually come forward; based on a mixture of desirability and necessity. For some items this could well be up-front provision or within the first 5 years, which as SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) sets out, will still make the developments viable.
- 11.2 The landowner developers have also confirmed that they can and will meet all the policy requirements for development of the Broad Locations, including infrastructure delivery. These confirmations, in person and in writing May/June 2018, set out that this included taking into account all relevant draft Local Plan policies as a whole. The written confirmations were included in PPC reports in June 2018 as linked to below: http://stalbans.moderngov.co.uk/ieListDocuments.aspx?Cld=459&Mld=8683&Ver=4
- 11.3 As set out in more detail in response to other MIQs, the landowner / developer teams have further and recently confirmed the viability / deliverability / developability and funding of the Broad Locations in Statements of Common Ground (SoCGs) from December 2019.
- 11.4 Please also see the Council's response to M6 Q20 for more information.

12. Question 12

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

- 12.1 Yes, the Council considers that there is good and proportionate evidence that the infrastructure requirements will be delivered within the necessary timescales. A selection of the key evidence is set out below.
 - Key infrastructure stakeholders are aware of plan proposals for broad locations through work on the Local Plan and the IDP. Infrastructure requirements for broad locations have been subject of discussion between: SADC, HCC, infrastructure stakeholders, and landowner / developers. For an example of the work, please see Maylands Growth Corridor Investment Prospectus at IDP appendix 3 in document INFR 002b. Collaborative working between stakeholders is also taking place during the Masterplanning process, where delivery of infrastructure is a work stream priority. This collaborative approach, secured by PPAs, is intended to continue through to the Planning Application phases.
 - The SADC CIL LP Viability Strategic Site Testing (<u>INFR Sep 2019</u>) confirms that policy compliant development of broad locations, including relevant infrastructure is viable. Please see response to M6 Q20 for more information.
 - The landowner developers have confirmed that they can meet policy requirements for development of broad locations, including infrastructure requirements. These confirmations, in person and in writing May/June 2018, set out that this included taking into account all relevant draft Local Plan policies as a whole. The written confirmations were included in PPC reports in June 2018 as linked to below: http://stalbans.moderngov.co.uk/ieListDocuments.aspx?Cld=459&Mld=8683&Ver=4
 - As set out in more detail in response to other MIQs, the landowner / developer teams have further and recently confirmed the viability / deliverability / developability and funding of the Broad Locations in Statements of Common Ground (SoCGs) from December 2019.
 - The Hemel Hempstead Broad Locations have been afforded Garden Community status (within the wider HGC proposal). Already this has meant that MHCLG additional funding has been allocated to fast-track specialist survey work and Masterplanning necessary for development. The Garden Community status provides extra confidence regarding commitment, resourcing and intent. As the Minister set out at the time of the announcement:

Minister of State for Housing Kit Malthouse MP said:

These new towns will not only provide homes for families, but will be vibrant communities where everyone, including neighbouring communities can benefit from new infrastructure – leaving a legacy for future generations to be proud of.

I congratulate these councils who have put forward ambitious proposals, which will build many thousands of high-quality homes, and am pleased to support them as they work to make these plans a reality.

- Future funding from CIL will also assist delivery of infrastructure. The Council is seeking to introduce CIL at the earliest opportunity after plan adoption. Evidence documents have been completed in readiness for next steps in the CIL process. Please see: St Albans CIL and Viability Report Final Draft November 2017 (INFR 009) and SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019).
- It can additionally be noted that the Council has a good track record of securing S106 for delivery of infrastructure schemes. Key references are set out below:
 - The Authority Monitoring Report 2018 (<u>AMR 001</u>) at Appendix 4 shows S106 agreements signed 2017-2018 & 2016-2017 and payments received 2017-2018 & 2016-2017.
 - The Council keeps an online database for District S106 receipts and funded schemes which can be found: https://www.stalbans.gov.uk/community-and-living/improvements/section106projects/.
 - HCC also keep a database to monitor County S106 receipts and funded schemes.
- There is a good track record of infrastructure delivery in the District, which has normally involved input from multiple stakeholders. Recent examples include:
 - Sustainable Transport St Albans Green Ring
 - Leisure Centre Westminster Lodge
 - Leisure Centre Cotlandswick
 - Leisure Centre Batchwood
 - Leisure & Cultural Hub Harpenden (Planning Stage)
 - Education Katherine Warrington Secondary School (Under Construction)
 - o Education Alban City Primary School
 - Education Harpenden Academy Primary School
 - Education Expansion of existing primary and secondary schools
 - Civic Hub Relocation of Police, NHS and CAB to share Council Offices
 - Specialist Housing Flexicare/extracare developments at: Lea Springs; Park Side View; Evewood House
 - Library Co-location with fire stations at Wheathampstead and Redbourn. This
 project has been supported by grant funding from the Home Office.
 - Library Major refurbishment of St Albans Library which is Hertfordshire's busiest library
 - NHS GP Development of Doctors Surgery at Caledon Community Centre
 - NHS GP New premises for Hatfield Road Surgery
 - St Albans Museum and Gallery
 - Various Green Infrastructure Schemes including open spaces & play areas

13. **Question 13**

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

- 13.1 No, the Council does not consider that policy S6 should make more specific requirements as regards the provision and timing of the infrastructure needs for the proposed Broad Locations. This is set out in more detail in the Matter 7 responses for each Broad Location. Overall, the Council considers that the level of detail set out in the policy is appropriate for the Local Plan. More specific requirements will emerge in due course through the Masterplanning process, the timings of which are set out in the Councils response to M6 Q5, as well as the Infrastructure Delivery Schedule within the Infrastructure Delivery Plan, also set out in M6Q9 Appendix 1.
- 13.2 Further infrastructure work is required to be undertaken, and this has been identified in the Infrastructure Delivery Plan 2018/19 (INFR 001), as well as the HCC COMET Study LP4 (INFR OCT 2019). This work is already well underway with regard to the first tranche of Masterplans for the first Broad Locations.

14. 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?

14.1 Yes, the Council considers that there are effective mechanisms between the Council and other neighbouring authorities and infrastructure providers. As set out in the Infrastructure Delivery Plan:

The IDP draws together collaborative research and modelling, in cooperation with a wide range of service providers including Hertfordshire County Council (HCC) and District Council services, along with public / private infrastructure providers outside of local government. The IDP focuses on the key infrastructure needs derived from plans and strategies of each of these bodies, as well as estimates based on proposed growth levels. On-going dialogue with infrastructure providers is essential to plan for infrastructure needs. This relationship is reciprocal and the IDP, alongside the Local Plan, informs the business plans and strategies of service providers and partners in turn.

14.2 Furthermore, in reference to joint working within the South West Hertfordshire Planning Group, the IDP sets out;

Under the Duty to Cooperate, the District Council is working with other Councils on joint strategic planning for South West Hertfordshire (SW Herts). The SW Herts area covers the administrative areas of: Dacorum, Hertsmere, St Albans, Three Rivers and Watford. The purpose of the group is for the five local planning authorities (LPAs) to engage constructively on an on-going basis in relation to strategic planning, infrastructure and investment priorities in SW Herts. In January 2018, the five Councils and HCC agreed a Memorandum of Understanding, which sets out how cooperation between the LPAs will be managed in respect of strategic planning issues.

A Draft Statement of Common Ground (SoCG)12 was put forward in February 2019, which sets out how a Joint Strategic Plan (JSP) for the South West Herts area will be delivered. In particular, the SoCG outlines the Strategic Plan's proposed evidence base, identification of various development needs, its delivery strategy and management process.

- 14.3 Considerable detail has been set out in response to Matter 2 Questions regarding the arrangements. Principally between SADC and DBC with regard to the Hemel Broad Locations (HGC) and with regard to the 5 South West Herts LPAs and HCC.
- 14.4 The Council is awaiting the adoption of the Plan before it can put in place CIL. It therefore currently seeks contributions in respect of large scale development from S106 agreements. Contributions sought by HCC are set out in the Hertfordshire Planning Obligations Toolkit. Furthers details of how these contributions will be sought are set out in L17 Infrastructure.

15. **Question 15**

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

15.1 Yes, as addressed in response to Matter 2 Questions (particularly M2 Q12), there are considered to be potential cross boundary transport impacts from the Broad Locations. As set out in more detail in response to Matter 2 Questions, these impacts arise due to: (1) the cumulative impact of the quantum and locations of development at the Broad Locations and (2) the specific impacts of the East and North Hemel (HGC) Broad Locations. These 'impacts' are all normal for development of this scale and are being addressed appropriately, as set out in the earlier Matter 2 responses.

16. Question 16

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

16.1 No, the Council considers that none of the strategic infrastructure is reliant on other development coming forward in neighbouring authorities. It will be supported by other development coming forward and will itself support other development coming forward in neighbouring authorities. This is most notably the case with regard to the East and North Hemel Broad Locations and the associated transport infrastructure and its strong links with Hemel Hempstead within Dacorum Borough.

17. 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?

17.1 Yes, as set out in response to earlier Questions, the delivery of key infrastructure will indeed allow for the delivery of planned development in line with the Housing Trajectory in the Plan. The Council has produced a draft updated 1 April 2019 base date (as set out in response to Matter 8 Questions). The Council further acknowledges, as it has in response to other Questions, that due to the scale and complexity involved in bringing forward such a stepchange in housing growth (250% of historic norms), there may be some challenges with regard to key infrastructure provision over time. The existing SADC Member, officer and key partner (eg Homes England, DBC, Herts LEP etc) supervisory and Masterplanning structures, in particular with regard to HGC, provide an appropriate series of mechanisms to ensure delivery of the key infrastructure.

18. **Question 18**

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

18.1 The Council considers that there are no fundamental constraints to the delivery of strategic infrastructure. The Council acknowledges that there are specific issues to be addressed through the ongoing Masterplanning and forthcoming DM processes; for example the exact design of key junction improvements, the exact mix of facilities to be provided within the network of MMTIs etc, but consider that there are no overriding or unsurmountable constraints.

19. Question 19

- [i] What are the implications of allocating the site of the approved Strategic Rail Freight Interchange at Park Street Garden Village for housing? [ii] Can an alternative site be provided? [iii] What are the wider cross boundary/national consequences of the Interchange not being delivered there?
- 19.1. [i] As also addressed in the Green Belt Topic Paper (ED 25C), the potential implications of allocating the site of the approved Strategic Rail Freight Interchange at Park Street Garden Village for housing have been considered throughout the drafting of this Plan. This has included reporting and considering correspondence from and on behalf of SEGRO to our Planning Policy Committee (PPC), Cabinet and Council; as well as responses to the Local Plan Regulation 18 and Regulation 19 consultations. This has been included at M6Q19 Appendix 1. This contains the Letter from SEGRO, reported at PPC May 2018; three letters from Hogan Lovells reported at PPC 12 June 2018 and Cabinet 21 June 2018; and the Letter from Hogan Lovells and an associated SADC commentary reported at Council 11 July 2018.
- 19.2. The May 2018 PPC considered a report entitled 'Indicative new draft Local Plan for Publication (Regulation 19 stage) consultation'. This report set out:

. . .

- 3.1. As agreed at previous PPC meetings, the Committee's work programme sets out consideration of an indicative new draft Local Plan (LP) at this meeting. This is to give councillors an early opportunity to give feedback.
- 3.2. Following legal advice, further work is required on the evidence base which will necessitate re-evaluation of the approach and strategy for housing development. The draft plan attached to this report should be considered as a working draft and will be subject to change / modification.

_ _ .

- 4.16. The committee will note that the working draft Local Plan at Appendix 1 contains 11 Broad Locations. These consist of all 8 of the Green rated sites from the draft Strategic Site Selection process (report on this Agenda). Officers have come to the initial draft conclusion that the advantages of 2 of the included sites (Hemel Hempstead North and South East Hemel Hempstead), as identified, are greater than that of the excluded site. In relation to the Park Street Garden Village Broad Location, this is a conditional allocation. After legal advice, this allocation will be the subject of a fresh reevaluation following the gathering of evidence on the relative merits and importance of delivering the site either for housing or the Strategic Rail Freight Interchange, for which it was found that there was a national need. This reevaluation will include looking at alternative strategies which would deliver the identified housing elsewhere including options such as identifying a Housing Target for Neighbourhood Plan areas.
- 19.3. Taking this forward as indicated in the May 2018 PPC report, June (12 June and reconvened meeting on 18 June) 2018 PPC considered a report entitled 'Draft Local Plan for Publication (Regulation 19 Stage) Consultation Recommendation to June Cabinet'. It set out:

. . .

3.2. Following legal advice mentioned in reports to PPC in May 2018, further work has been required on the evidence base which has necessitated re-evaluation of aspects of the approach and strategy for housing development. That work has been undertaken and can be seen at Appendix 1. It is important to note that there will be ongoing work in this area and that it will be subject to further review in the future. Any significant matters will be reported to the Committee for awareness/consideration as appropriate.

. . .

- 4.18. The Committee will note that the draft Local Plan at Appendix 3 contains 11 Broad Locations. These consist of all 8 of the Green rated sites from the Strategic Site Selection process (report on this Agenda). Officers have come to the conclusion at this time that the advantages of 2 of the included sites (Hemel Hempstead North and South East Hemel Hempstead), as identified, are greater than that of the excluded sites. In relation to the Park Street Garden Village Broad Location, this continues to be a conditional allocation. After legal advice, this allocation has been the subject of a fresh re-evaluation following the gathering of evidence on the relative merits and importance of delivering the site either for housing or the Strategic Rail Freight Interchange, for which it was found that there was a national need. This re-evaluation has included looking at alternative strategies which would deliver the identified housing elsewhere including options such as identifying a Housing Target for Neighbourhood Plan areas. This re-evaluation is at Appendix 1.
- 19.4. This <u>June 2018</u> PPC Appendix 1 is entitled 'Draft Park Street Broad Location re-evaluation following the gathering of evidence on the relative merits of housing and the SRFI as well as alternative strategies which would deliver the identified housing elsewhere' and is included as appendix M6Q19 Appendix 2.
- 19.5. This appendix shows a detailed and comprehensive consideration of the potential implications of allocating the site of the approved Strategic Rail Freight Interchange at Park Street Garden Village for housing; alternative sites; and wider cross boundary/national consequences of the Interchange not being delivered there.
- 19.6. Whilst it is considered critical that M6Q19 Appendix 2 should be considered in full, key extracts can be highlighted as:

Purpose of this re-evaluation

As has been dealt with above, in general terms the NPPF requires that the local plan should seek to facilitate the SRFI.

However, the NPPF also requires the Local Plan to seek to provide land for the objectively assessed development needs of other forms of development in a local authority's area, including housing. Consequently there are often tensions in plan-making between seeking to meet varying needs, the limited environmental resources to accommodate those various requirements and competing priorities. This is made clear by the wording in paragraph 182 of the NPPF, first bullet, when it is stated that the authority should "seek" to meet the relevant needs "where it is reasonable to do so and consistent with achieving sustainable development". There is, as is indicated in a number of policy documents and assessments, a need to provide housing in within the Council's area and to protect the Green Belt.

In this instance, therefore the Council must weigh up the loss of the benefits associated with the SRFI (including national need for SRFIs as indicated in national policy, the provision of a country park and other less significant matters) against the benefits of delivering housing (and other less significant matters) on the site.

In order to justify the loss of the SRFI opportunity, however, it is also necessary to consider whether it is appropriate (taking into account other considerations, like Green Belt considerations) to find another location for the housing development in order to allow the SRFI to be provided. Full account must be taken of the effect of not providing a nationally significant infrastructure proposal like the SRFI, should a housing strategy that prevents such development be selected.

The Council is required, therefore, to consider whether the effect of delivering housing on an alternative site or sites, along with the benefit of delivering the SRFI comprises a preferable and more appropriate strategy to a proposal that delivers housing on the SFRI site and prevents delivery of the SFRI.

Benefits of SRFI

. . .

The Council fully acknowledges these potential benefits.

Benefits of Housing

..

Deliverability / developability of the site for housing

. . .

Alternative housing development strategy options and effects of different strategies tested against the current proposed strategy

. . .

The options overall

In all the options set out above it would be possible for the Council to prepare a Local Plan that had no impact on the SRFI site as a result of inclusion of a housing site, or sites, with similar capacity to the former Radlett Airfield (SFRI site).

However it is clear that such an alternative housing strategies 1-3 and 5 / 6 would significantly increase overall Green Belt loss and would do so on sites where there are greater site specific adverse impacts on Green Belt purposes. Only option 4 with its potential to divert housing development beyond the Green Belt might possibly avoid this outcome.

Overall, these alternative housing development strategy options need to be considered in three ways:

First; are there better alternative housing strategies with currently identified sites that would completely avoid any need to consider use of the Radlett Airfield SFRI site? There are no such strategies because the Council's comprehensive Green Belt Review and call for sites / site selection process has only identified a very limited number of Amber rated sites. There is insufficient capacity in these sites to entirely replace the option of using the former Radlett Airfield site. The NPPF requires exceptional circumstances for release of Green Belt and the circumstances must be site specific.

Second; following from the above, are there alternative strategies based on a combination of currently identified sites and other newly identified sites (i.e. sites more damaging to Green Belt purposes, or diversion of development outside the District to areas beyond the Green Belt)?

Such a strategy cannot be put in place because there is no mechanism available to the Council to bring forward non Green Belt Sites outside the District and to use site more damaging to Green Belt would not satisfy the NPPF requirement for site specific exceptional circumstances to justify release.

Third; is a site combination (achieved on the basis of either of the first and second points above) that allows both the SFRI to go ahead and the Plan to achieve its housing requirement / target, more appropriate, on balance, than an option that prevents the SFRI proceeding?

This is the consideration underlying the conclusions of this re-evaluation.

Other alternative locations for an SRFI

The Inspector concluded (13.119):

However, other considerations including, particularly the need for SRFIs to serve London and the South East and the lack of more appropriate alternative locations for an SRFI in the north west sector......

The Secretary of State concluded:

"The Secretary of State has had regard to the Inspector's comment at IR13.34 that, as the Council accepted in evidence, the need for SRFIs is stated and restated in a number of documents. The Secretary of State observes that the Written Ministerial Statement of 29 November 2011 makes clear that there remains a need for a network of SRFIs to support growth and create employment and that it has proved extremely problematical, especially in the South East, to create appropriately located SRFIs. The SRFI Policy Guidance published on 29 November 2011 states that only one SRFI had been granted planning consent in the whole of the South East region and advises that SRFI capacity needs to be provided at a wide range of locations, particularly but not exclusively serving London and the South East. The Secretary of State has had regard to the comment made by STRIFE (letter of 4 March 2014) that the proposed SRFI at Howbury Park has not been delivered. However, he tends to the view that this only serves to reinforce the point made in the 2011 Written Ministerial Statement on Strategic Rail Freight Interchanges that, in the South East in particular, it is proving extremely problematical to develop SRFIs."

The Council fully acknowledges these issues and potential benefits of an identified site.

Key issue – At a point in time

This re-evaluation is appropriate for this point in time. It will be revisited as time and the situation progresses. Assessment and judgments for these issues are time-sensitive and there is significant potential for revision. This is in particular given the high likelihood that the new NPPF Update will be published in June/July 2018.

The Local Plan Regulation 19 formal consultation stage itself is yet to come. This stage and consideration of representations made at this stage will be an important matter for the Council in deciding on progress towards submission.

Parties including SEGRO/Helioslough, the Government, the Railfreight industry, HCC etc. will be fully able to respond to that consultation and we welcome their formal feedback at that stage.

Conclusion

Overall, at this time, the current view of officers is that the draft Broad Location for Park Street Garden Village is the most appropriate response to the evidence available. This will be kept under ongoing review, in particular in the light of responses to the Regulation 19 Local Plan formal consultation.

19.7. Additionally, a draft SA Working Note was considered by PPC and Cabinet in <u>June 2018</u>. The finalised SA report accompanied the LP Reg 19 consultation in September - October 2018. It set out:

4.3.3.Planning Policy Committee (PPC) meeting 12th June 2018 - Park Street Garden Village Broad Location Re-evaluation

In relation to the Park Street Garden Village Broad Location, following the overall site selection process and the findings, the Council undertook a re-evaluation to look more specifically at the relative importance and merits of using the site either for housing or as a Strategic Rail Freight Interchange6. This has some general relevance for the selection of Local Plan Broad Locations for housing, as the re-evaluation looked at six alternative strategies for delivering elsewhere the level of housing that could be delivered at Park Street Garden Village. These alternative strategy options were as follows: North East Redbourn; Using Red rated sites; Different delivery trajectories; Other LPAs delivering development; Neighbourhood Plans; and Development of a number of smaller sites currently in the Green Belt.

St Albans Planning Policy Committee meeting 12th June 2018. Agenda Item 10. http://stalbans.moderngov.co.uk/documents/s50035482/PPC%20June%202018%20-%20Draft%20Local%20Plan%20-%20Appendix%201%20-%20Re-evaluation%20of%20approach%20FINAL.pdf

Of these six alternative strategies, five were not considered by the Council to be reasonable alternatives because they involved reliance on development that was contrary to the strategy set for the plan (minimisation of adverse impacts on Green Belt purposes (Green Belt review led) and / or greater dispersal of development, with less favourable outcomes for community benefits and infrastructure improvement. They were therefore not subject to SA. The one exception was the site/alternative strategy option to develop the site at North East Redbourn Broad Location which had previously been considered to be a reasonable alternative in the wider context of the Local Plan site evaluation process and had therefore been subject to SA alongside the 11 other 'Green' and 'Amber' rated sites (see Section 4.4.3). However, as noted above the advantages of the other sites were considered to be greater than those for North East of Redbourn. Additionally, in relation to the particular considered that the North

East Redbourn option would not deliver the equivalent quantum of housing development required 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.

19.8. After the Local Plan Regulation 19 publication in October 2018, March 2019 PPC considered a report entitled 'Draft Local Plan for Submission to the Secretary of State – recommendation to Cabinet'. It set out:

. . .

3.3. The LP must comply with legal requirements. The LP must have regard to the Government's national planning policy, principally in the National Planning Policy Framework (NPPF). The draft Plan was prepared to take account of both the original NPPF (2012) and the Government's proposed revision version in 2018. Since that time, a finalised NPPF 2018 and a marginally revised NPPF 2019 have been published by the Government. Both updates have been considered and do not require changes to the draft LP (see also later in this report). In particular, the draft Plan is based on the NPPF (2018 and 2019) 'standard methodology' for assessing housing need (see also elsewhere on this Agenda). The Plan also needs to be based on proportionate and justifiable evidence.

. . .

Park Street Garden Village

4.15. As addressed at PPC in June 2018, the committee will note that the draft Local Plan contains 11 Broad Locations. In relation to the Park Street Garden Village Broad Location, after legal advice, this allocation was the subject of a re-evaluation following the gathering of evidence on the relative merits and importance of delivering the site either for housing or the Strategic Rail Freight Interchange, for which it was found that there was a national need. This reevaluation included looking at alternative strategies which would deliver the identified housing elsewhere including options such as identifying a Housing Target for Neighbourhood Plan areas. This re-evaluation set out:

Key issue – At a point in time

This re-evaluation is appropriate for this point in time. It will be revisited as time and the situation progresses. Assessment and judgments for these issues are time-sensitive and there is significant potential for revision. This is in particular given the high likelihood that the new NPPF Update will be published in June/July 2018.

The Regulation 19 formal consultation stage itself is yet to come. This stage and consideration of representations made at this stage will be an important matter for the Council in deciding on progress towards submission.

Parties including SEGRO, the Government, the Railfreight industry, HCC etc. will be fully able to respond to that consultation and we welcome their formal feedback at that stage.

. . .

Conclusion

Overall, at this time, the current view of officers is that the draft Broad Location for Park Street Garden Village is the most appropriate response to the evidence

available. This will be kept under ongoing review, in particular in the light of responses to the Regulation 19 Local Plan formal consultation.

4.16. The re-evaluation considered at June 2018 PPC (and Cabinet and Council thereafter) has been further reviewed in the light of more recent considerations (March 2019). These considerations have included: correspondence reported to Cabinet and Council in June and July 2018, the LP regulation 19 Publication consultation responses (reported elsewhere on the Agenda), further Sustainability Appraisal work (see Appendix 2) and the NPPF 2018 and 2019 revisions. Of particular note is the updated text in the NPPF (2018 and 2019) relating to interchanges for rail freight. Paragraph 104 sets out:

Planning policies should:

. . .

- e) provide for any large scale transport facilities that need to be located in the area⁴², and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements;
- 42 Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services.
- 4.17. There have also been a number of other related matters where circumstances have moved on for example the 'making' of the Harpenden Neighbourhood Plan in February 2019 and the fact that there have been a further number of conditions discharged in relation to the permitted Strategic Rail Freight Interchange.
- 4.18. This further review (at Appendix 3) does not alter the overall view of officers that the draft Broad Location for Park Street Garden Village is the most appropriate response to the evidence available.
- 19.9. This March 2019 PPC Appendix 3 is entitled 'Draft Park Street Broad Location Review of the re-evaluation following the gathering of evidence on the relative merits of housing and the SRFI as well as alternative strategies which would deliver the identified housing elsewhere' and is included as appendix M6Q19 Appendix 3.
- 19.10. Whilst it is considered critical that M6Q19 Appendix 3 should be considered in full, key extracts can be highlighted as:

The re-evaluation considered at June 2018 PPC (and Cabinet and Council thereafter) has been further reviewed in the light of more recent considerations (March 2019). These considerations have included: correspondence reported to Cabinet and Council in June and July 2018, the LP regulation 19 Publication consultation responses (reported elsewhere on the Agenda), further Sustainability Appraisal work (see Appendix 2) and the NPPF 2018 and 2019 revisions. Of particular note is the updated text in the NPPF (2018 and 2019) relating to interchanges for rail freight....

. . .

There have also been a number of other related matters where circumstances have moved on – for example the 'making' of the Harpenden Neighbourhood Plan in February 2019 and the fact that there have been a further number of conditions discharged in relation to the permitted Strategic Rail Freight Interchange (SRFI).

Regulation 19 Representations by RPS on behalf of Helioslough Ltd

These are set out in 4 sections and with two Appendices. They can be concisely addressed as follows.

<u>1 – Strategic Rail Freight Interchange</u>

The benefits of an SRFI were fully acknowledged in the Re-evaluation. The challenge of finding alternative sites was also fully acknowledged in the Reevaluation. The information referred to at Appendix A is acknowledged.

2 – Park Street Garden Village

The challenge to the approach taken in the SA/SEA with regard to the Park Street Garden Village is misconceived. The Site Selection and Local Plan processes fully acknowledged the consequences of not providing the SRFI. The SA/SEA looked at the likely effects of development for housing, with the 'alternatives' of Park Street Garden Village vs Strategic Rail Freight Interchange having been taken into account at a different step – the evaluative stage. For example, the Strategic Site Selection Evaluation Outcomes report sets out explicitly:

Existing significant permission

Outline planning permission was granted by the Secretary of State for a Strategic Rail Freight Interchange (SRFI) on 14/07/2014 (LPA reference 5/2009/0708). Three Reserved Matters applications have been submitted to the LPA and are awaiting determination.

. . .

It is recognised that the Secretary of State has determined that "the factors weighing in favour of the appeal include the need for SRFIs to serve London and the South East...the lack of more appropriate alternative locations for an SRFI in the north west sector which would cause less harm to the Green Belt...the local benefits of the proposals for a country park, improvements to footpaths and bridleways and the Park Street and Frogmore bypass".

The re-evaluation explicitly related to "the relative merits of housing and the SRFI".

Nonetheless, in order to provide PPC, Cabinet and interested parties with a comparative assessment in the SA/SEA format for understanding, this assessment has now been carried out. This assessment is included in the updated draft SA/SEA (see Appendix 2).

3 - Site Evaluation Process

The challenge to the approach taken in the Strategic Site Selection process with regard to the Park Street Garden Village is misconceived. It misunderstands the process that was undertaken (and is made explicit) in the Strategic Site Selection work. Most particularly it mistakes the assessment of 'parcels' and that of 'sites'. It is entirely logical that, in some instances, as the assessment sets out, some of 'most significant' parcels contain some Green or Amber rated sites; and conversely that some of the 'least important' parcels do not contain Green or Amber rated sites.

4 - Housing Need

The 'Standard Methodology' has more recently been confirmed by the Government, based on the 2014 household projections.

Appendix A – see comment under section (1) above Appendix B – noted

Conclusion

This further review does not alter the overall view of officers that the draft Broad Location for Park Street Garden Village is the most appropriate response to the evidence available.

- 19.11. This March 2019 PPC Appendix 2 is entitled 'St Albans Local Plan Submission Sustainability Appraisal Report Addendum' and its Appendix C is entitled 'Appendix C: Assessment of Strategic Rail Freight Interchange' and is included as appendix M6Q19 Appendix 4.
- 19.12. The key extract can be highlighted as:

Appendix C: Assessment of Strategic Rail Freight Interchange This Appendix provides an assessment of the proposed Strategic Rail Freight Interchange (SRFI) alongside the existing assessment for Park Street Garden Village (PSGV).

19.13. [ii] As indicated above, the Council is not currently aware of an alternative site. That does not mean that an alternative site might not emerge, though the considerable challenge of finding sites for Strategic Rail Freight Interchanges continues to be acknowledged. As set out at M6Q19 Appendix 1:

"...The Secretary of State has had regard to the comment made by STRIFE (letter of 4 March 2014) that the proposed SRFI at Howbury Park has not been delivered. However, he tends to the view that this only serves to reinforce the point made in the 2011 Written Ministerial Statement on Strategic Rail Freight Interchanges that, in the South East in particular, it is proving extremely problematical to develop SRFIs."

The Council fully acknowledges these issues and potential benefits of an identified site.

- 19.14. As is considered clear from the aforementioned PPC, Cabinet and Council reports, the considerable challenge of providing alternative sites is acknowledged and has been considered throughout the development of the Plan.
- 19.15. [iii] As also indicated above, it is also considered clear from the aforementioned PPC, Cabinet and Council reports that the wider potential consequences of the Interchange not being provided are acknowledged and have been considered throughout the development of the Plan.

20. 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?
- i) Is the residual value methodology appropriate?
- k) Has income from commercial floorspace been factored into the calculations?
- 20.1 A related response was made previously. See Councils Response to Inspectors Initial Questions Monday 24th May 2019 Councils Response to Inspectors Initial Questions Friday 24th May 2019 Question 15 '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?' (Document Ref ED17 24.5.19)
- 20.2 Yes the economic viability of each of the proposed Broad Locations has been adequately demonstrated in the CIL and Viability evidence base.
- 20.3 One of the key documents is the St Albans CIL and Viability Report Final Draft Nov 2017 (INFR 009). This document sets out at paragraph 2.2 'Viability testing of specific strategic sites is anticipated to follow as a subsequent piece of work'. This approach accords with PPG 2019 which states:

It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan.

20.4 The Strategic Site Testing for the Broad Locations has been undertaken and can be found at document SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019). The Council considers that this work on the strategic sites / Broad Locations complements the original St Albans CIL and Viability Report Final Draft Nov 2017 (INFR 009). The introduction to INFR Sep 2019 sets out:

... this report outlines the results of the additional high level viability testing undertaken on the ... strategic development site as allocated in the St Albans City and District Local Plan 2020-2036 Publication Draft 2018 ('LPPD'). This work follows the St Albans Community Infrastructure Levy and Emerging Local Plan Viability Study ('CIL&LPVS') report dated November 2017, which tested the ability of a range of development types throughout the City and District to yield contributions to infrastructure requirements through the Community Infrastructure Levy ('CIL') along with the planning policy requirements of the emerging St Albans City and District Local Plan Draft and other key local policies and guidance as well as national policies.

This report has been prepared with the particular purpose of testing the cumulative impact of the Councils emerging requirements on the identified strategic development site including affordable housing, on-site Section 106 obligations, the Council's proposed CIL charges and on-site infrastructure and sustainability measures. This is in line with the requirements of the National Planning Policy Framework 2018 ('NPPF'), the NPPG and the Local Housing Delivery Group guidance 'Viability Testing Emerging Local Plans: Advice for planning practitioners' (June 2012).

- 20.5 The CIL and Viability evidence demonstrates that both whole plan viability and strategic sites or broad locations are viable. Please see some relevant extracts set out below:
 - SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) concludes:

This testing demonstrates that the strategic site is viable and deliverable having regard to both the Council's planning policy requirements (including affordable housing and development specified in Policy S6... and the proposed Community Infrastructure Levy charging rates set out in BNPPRE's November 2017 CIL&LPVS.

Table 4.1: Appraisal results – East Hemel Hempstead (South)

Scenario appraised	Residual land value	BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£82,810,000	£36,260,000	Viable

Table 4.1: Appraisal results – East Hemel Hempstead (North)

Scenario appraised	Residual land value	BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£79,032,000	£25,049,000	Viable

Table 4.1: Appraisal results – East St Albans

Scenario appraised	Residual land value	BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£68,924,000	£19,425,000	Viable

Table 4.1: Appraisal results - North East Harpenden

Scenario appraised	Residual land value	BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£52,653,000	£11,729,000	Viable

Table 4.1: Appraisal results - North Hemel Hempstead

Scenario appraised		BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£90,322,000	£24,716,000	Viable

Table 4.1: Appraisal results - North St Albans

Scenario appraised		BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£72,954,000	£17,279,000	Viable

Table 4.1: Appraisal results – North West Harpenden

Scenario appraised	Residual land value	BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£44,037,000	£6,734,000	Viable

Table 4.1: Appraisal results - West of Chiswell Green

Scenario appraised		BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£30,729,000	£5,624,000	Viable

Table 4.1: Appraisal results - Park Street Garden Village

Scenario appraised		BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£81,038,000	£36,149,000	Viable

Table 4.1: Appraisal results – West of London Colney

		•	
Scenario appraised	Residual land value	BLV (based on £370,000 per Ha)	Viable/ Unviable
40% AH & CIL	£29.445.000	£5.106.000	Viable

20.6 Yes the Council considers that the CIL and Viability evidence is robust and demonstrates that the Local Plan is viable and based on reasonable assumptions. It is considered that a key test relates to policy compliance for Affordable Housing. As set out in Self-Assessment of Soundness and Legal Compliance 2019 (ref CD 025) on pages 37 & 38 and replicated below. It states that 'CIL and Viability Report Final Draft 2017 (INFR 009) demonstrates planning wide viability in relation to the role of CIL and affordable housing'. The St Albans CIL and Viability Report Final Draft Nov 2017 (INFR 009) sets out at para 7.5 'The results of our testing demonstrates that the Council's proposed affordable housing target seeking 40% affordable housing in developments across the borough is reasonable.'

Soundness Test and Key Requirements	Possible Evidence	Possible Evidence
Infrastructure Delivery Planning	 A schedule setting out responsibilities for delivery, 	This is detailed in the LP Infrastructure Delivery Schedule (LP Appendix 4)
 Have the infrastructure implications of the policies clearly been identified? 	mechanisms and timescales, and related to a CIL schedule where appropriate.	and the Infrastructure Delivery Plan (IDP). The IDP has been prepared in parallel with the LP process. It is published at the point of submission to

- Are the delivery mechanisms and timescales for implementation of the policies clearly identified?
- Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?
- Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.
- Demonstrable planwide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.

detail the current position on infrastructure planning work being undertaken by SADC and infrastructure providers.

The IDP demonstrates the important LP infrastructure dependencies. The Plan is sound because the available evidence is that necessary infrastructure can be provided within the Plan period.
CIL and Viability Report

CIL and Viability Report Final Draft 2017 (INFR 009) demonstrates planning wide viability in relation to the role of CIL and affordable housing.

- 20.7 [a] The St Albans CIL and Viability Report Final Draft Nov 2017 (INFR 009) was undertaken on an earlier version of the Plan. The SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) was based on the Publication version of the Plan.
- 20.8 [b] Yes, the SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) was undertaken in accordance with the PPG and is up to date. The introduction makes specific reference to the PPG 2019 as set out below:

The National Planning Practice Guidance on Viability 2019 ('NPPG') identifies at paragraph 003 that, "Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage." However, it goes on to identify that the "in some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies." This is reiterated in paragraph 005 which sets out that, "it is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan."

- ... This is in line with the requirements of the National Planning Policy Framework 2018 ('NPPF'), the NPPG and the Local Housing Delivery Group guidance 'Viability Testing Emerging Local Plans: Advice for planning practitioners' (June 2012).
- 20.9 The St Albans CIL and Viability Report Final Draft Nov 2017 (<u>INFR 009</u>) was carried out in line with the requirements of the National Planning Policy Framework ('NPPF') and the Local Housing Delivery Group guidance 'Viability Testing Emerging Local Plans: Advice for planning practitioners' (<u>June 2012</u>). It also took account of relevant PPG guidance as published at that time.
- 20.10 [c] Yes appropriate assumptions have been made about the level and timing of infrastructure costs and other costs based on the best available information and most up to date IDP & IDS.

20.11 As an illustration, S106 contributions & other costs for East Hemel Hempstead (North) can be found in SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019). Further information can be found in this document in addition to the extracts set out below. A similar approach was followed for other broad locations.

The Council have advised as to appropriate Section 106 contributions for specific infrastructure requirements associated with the delivery of this strategic site. We understand that these are broad estimates based on best available information as to the likely level of these costs including the apportionment of costs of delivering such infrastructure on existing sites in the District and high level knowledge of the likely specific costs being worked up at present. Given this these costs are likely to be refined as masterplanning of the strategic sites progresses. The Section 106 costs adopted in this study are as set out in Table 3.2.14 below.

Table 3.2.14: Section 106 contributions

Contribution description	n Contribution		
Education	£31,515,000	1 x 3 FE Primary (assumes £7.5m per primary school)	
		1 x 6-8 FE Secondary (assumes £35m per secondary	
		school)	
Community Facilities	£1,650,000	Based on £1,000 per unit	
Green	£3,300,000	Based on £2,000 per unit	
infrastructure:	£1,650,000	Based on £1,000 per unit	
Strategic open		·	
space / green			
infrastructure			
Local open/play			
Space/Green			
Infrastructure			
Transport	£18,150,000	Allows for:	
Infrastructure	2.0,.00,000	- Strategic - LTP4 major scheme;	
mindotraotaro		- Local highway - on & off site	
		- Sustainable travel - public transport;	
		- Sustainable travel - walking + cycling on & off site	
Total	£56,265,000	V ,	

[Note: Secondary school will be a proportional share of total cost]

We have assumed a worst case scenario for the contributions outlined above, in that these will be upfront costs. It is likely however that some or all of these costs may be phased throughout the total development period of the strategic site.

We have also included an allowance for any residual \$106 contributions over and above the identified items above. In line with the assumptions in the CIL&LPVS we have assumed £1,150 per unit and £20 per square metre for non-residential uses.

We have calculated the CIL liability of the proposed development based on the proposed CIL charges set out in the CIL&LPVS. These include £150 per square metre for residential floorspace

In line with the CIL&LPVS we have also allowed for extra over costs associated with policy requirements. We summarise these costs below, which we have incorporated within our appraisals.

Sustainable homes: £5,000 per unit;
 SUDs: £2,500 per residential unit;
 Lifetime Homes: £3,200 per unit; and

Accessible units: £26,000 per house and £11,000 on apartments (10% of units only).

In addition to ...base costs, we have included an allowance which equates to an additional 15% of the base cost for external works on the residential uses and 10% on the non-residential uses (commercial uses in the local centre and the health use). The allowance included for external works accounts for any additional costs that may be incurred due to the physical nature of the sites plus any works required for landscaping, security enhancement and pavements/driveways/parking works within the site.

In our experience it is likely that developers will be able to value engineer build costs to lower levels than assumed in this study on larger sites, such as the strategic sites in St Albans City and District area. We have not allowed for this in our assessment. Our appraisals also include a contingency of 5% of build costs.

We have also included an allowance of £20,000 per standard residential unit and £10,000 per unit for all other specialist residential units for infrastructure costs. In our experience greenfield sites such as East Hemel Hempstead (North) are likely to require significant development of infrastructure such as servicing and roads etc. to open up the site for development.

20.12 [d] Yes there is a contingency allowance of 5% build costs included in SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) and St Albans CIL and Viability Report Final Draft (INFR 009). To illustrate, a 5% contingency allowance for East Hemel Hempstead (North) is shown in the extract below.

Contingency	5.00%	11,411,908
Site opening up costs		34,120,000
Strategic Open Space		3,300,000
Local open/play space green infrast		1,650,000
S106		2,015,916
CIL		13,358,810
Transport		18,150,000
Education		31,515,000
Community Facilities		1,650,000

117,171,634

20.13 [e] Yes appropriate assumptions have been made about the rate of output for broad locations. Timing and phasing assumptions can be found in SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019). To illustrate, the development timescales for East Hemel Hempstead (North) are set out below together with an extract regarding the cash flow approach.

Table 3.2.16: Development timescales

Phase	Total	Phase 1	Phase 2	Phase 3
Pre-construction (months)	27	9	9	9
Construction (months)	120	40	40	40
Residential Sales (months)	120	40	40	40
Extra Care Units	10	0	10	0

The cash-flow approach allows the finance charges to be accurately calculated over the development period. This approach can accommodate more complex arrangements where a number of different uses are provided or development is phased.

20.14 [f] Yes appropriate assumptions are made about the timing of land purchases.

20.15 [g] Yes the viability threshold is set at an appropriate level. St Albans CIL and Viability Report Final Draft (INFR 009) at paragraphs 1.2 explains the approach to residual land values and benchmark land value which is replicated below. Also see para 20.5 above for appraisal results which are taken from SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019), which shows that all the Broad Locations are viable.

The study methodology compares the residual land values of a range of development typologies on sites throughout the Council to their value in current use (plus a premium), herein after referred to as 'benchmark land value'. If a development incorporating the Council's policy requirements including a given level of CIL generates a higher residual land value than the benchmark land value, then it can be judged that the site is viable and deliverable. Following the adoption of policies, developers will need to reflect policy requirements in their bids for sites, providing that the residual land value does not fall below a site-specific benchmark land value, determined at the time of each individual application.

- 20.16 [h] Yes the St Albans CIL and Viability Report Final Draft (INFR 009) has considered the issue of inflation. See examples as follows at para 2.12, para 4.5 and page 21.
 - 2.12 The Bank of England's August 2017 Inflation report saw a reduction in the Bank's prediction for economic growth for 2017 to 1.9% form 2%, a small increase in the 2018 forecast from 1.6% to 1.7% and a slight increase again in 2019 to 1.8%. The revisions continue to reflect the fact that the Bank considers the impact of any potential exit from the EU will be experienced later than expected.
 - 4.5 As noted earlier in the report, BNP Paribas Real Estate, Knight Frank and Savills predict that sales values will increase over the medium term. Whilst this predicted growth cannot be guaranteed, we have run a sensitivity analysis assuming growth in sales values of 10%, accompanied by cost inflation of 5%. This sensitivity analysis provides the Council with an indication of the impact of changes in values and costs on scheme viability.

Footnote: Our appraisals do not, however, include any inflation on existing use values due to build cost and policy cost increases as well as greenfield sites are not expected to grow in value. With respect to the former we note that Savills' 2017 'Market Survey [on] GB Agricultural Land' identifies that a fall in all farmland values of -6.2% in the east of England in 2016 as compared to a - 10% fall experienced in 2015. We note that this compares to a fall of -3.1% for England and -2.9% for Great Britain ('GB'). Savills forecast a 5.5% growth over the next 5 years to 2021 for GB with negative growth of -3.8% in 2017 and -1.7% in 2018 and positive growth in 2019 of 1.8%, 4.4% in 2020 and 5% in 2021 amounting to cumulative growth of 5.5% over the five year period. We note that the Savills GB Farmland Market Q2 2017 identifies that , "At the half-year stage, our Farmland Value Survey is still recording a slight fall (0.9%) in average values of 'all-types' of farmland across Great Britain across Great Britain to around £6,900 per acre. Most pressure is on prime arable land values in the East and East Midlands where prices have fallen 4% in some locations."

20.17 [i] Yes an appropriate allowance has been made for finance costs.

SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) sets out:

In line with the CIL&LPVS, our appraisal assumes that development finance can be secured at a rate of 7%, inclusive of arrangement and exit fees, reflective of current funding conditions.

St Albans CIL and Viability Report Final Draft (INFR 009) sets out:

- 4.23 Our appraisals assume that development finance can be secured at a rate of 7%, inclusive of arrangement and exit fees, reflective of current funding conditions.
- 20.18 [j] Yes the residual value methodology is considered to be appropriate. SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) sets out:

Our methodology follows standard development appraisal conventions and the standard methodology set out in the NPPG. It is also consistent with that adopted in the CIL&LPVS. This study utilises the residual land value ('RLV') method of calculating the value of the proposed development This method is used by developers when determining how much to bid for land and involves calculating the value of the completed scheme and deducting development costs (construction, fees, finance, sustainability requirements and CIL) and developer's profit. The residual amount is the sum left after these costs have been deducted from the value of the development, and guides a developer in determining an appropriate offer price for the site.

20.19 [k] Yes where applicable, income from commercial floorspace has been factored into the calculations. An illustration from SADC CIL LP Viability Strategic Site Testing (INFR Sep 2019) for East Hemel Hempstead North is set out below:

East Hemel Hempstead North

Rental Area Summary	Units	m²	Initial Rate m ² MRV/Unit	Net Rent at Sale	Initial MRV
Neighbourhood / Local Centre	1	990.00	237.00 234,630	234,630	234,630
Health Provision	1	394.00	0	0	
Totals	2	1,384.00		234,630	234,630

Investment Valuation
Neighbourhood / Local Centre

Market Rent 234,630 YP @ 6.5000% 15.3846

(1yr 6mths Rent Free) PV 1yr 6mths @ 6.5000% 0.9099 3,284,322

3,284,322

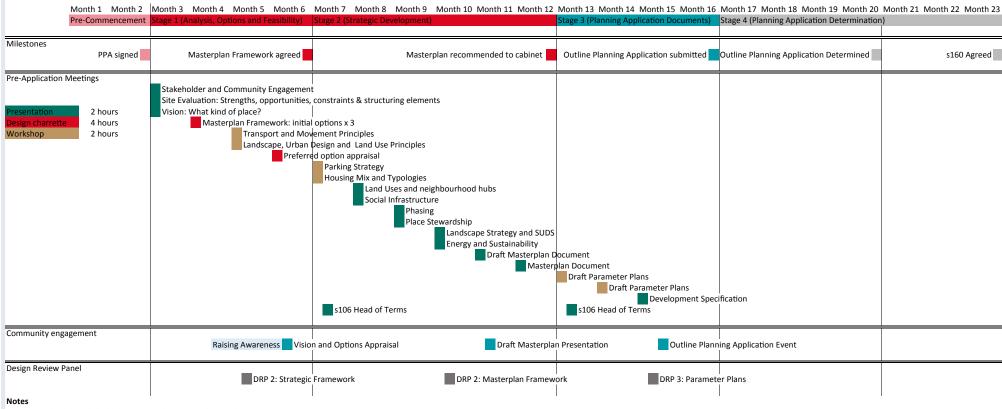
	Rent per sq m	Yield	Rent Free & Void (months)
Commercial	£237	6.50%	18

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

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- 1 HCC and other stakeholder metings to be arranged by applicant
- 2 Members' briefing and engagement should take place in advance of community engagement events
- 3 Community engagement during the Masterplanning stage should be led by the Council, with Applicant(s) present.

St Albans Local Plan - Statement of Common Ground between St Albans City & District Council (SADC) and the Crown Estate (TCE) - East Hemel Hempstead (North) Broad Location (S6 i)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC) and The Crown Estate (TCE) in relation to the Local Plan Broad Location S6 (i) – East Hemel Hempstead (North). It concisely considers areas of agreement between the parties following the TCE's representations on the St Albans Draft Local Plan in order to confirm the soundness and robustness of the Broad Location. It is anticipated that further agreed detail may be available by the time of the commencement of the Local Plan Hearing session on 21 January 2020.

The agreed matters in this SOCG do not preclude any further written or verbal representations that the District Council and TCE may wish to make as part of the Local Plan Examination.

TCE is working collaboratively, cooperatively, proactively and productively with SADC and all relevant partners to bring the site forward for development as set out in Policy S6 (i).

It is important to also consider alongside this document the signed Local Plan Developer / Site Promoter Response Proforma 2018 as set out at appendix 1.

2. Legal Compliance; Duty to Co-operate and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

The parties consider that the Local Plan is legally compliant and consistent with the principles of the National Planning Policy Framework (2019). It is considered that St Albans City & District Council has fulfilled the Duty to Co-operate and that the Local Plan has been prepared in accordance with the timetable set out in the Local Development Scheme. Furthermore, it is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement and appropriate bodies have been consulted. A comprehensive and robust Sustainability Appraisal has also been carried out to support the Local Plan.

3. The Site

The site S6 i) is shown on the Draft Local Plan Policies Map (CD003) and a map of the directly relevant area controlled/owned by TCE is given in Appendix 2.

4. Broad Location for Development

The parties for the site agree that Policy S6 (i) is sound and robust in principle and evidence shows that all requirements can and will be delivered at the point in time currently envisaged in the Plan:

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 i) - East Hemel Hempstead (North) Broad Location

Objective

To provide a major urban extension of Hemel Hempstead.

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with Dacorum Borough Council, local communities, landowners and other stakeholders
- 2 Minimum capacity 1,650 dwellings
- The 1,650 dwelling figure above includes at least one 50+ bed C2 Residential or Nursing care home, at least one 50+ home C3 Flexi-care scheme and 12 units to provide special needs accommodation, in accordance with Policy L2
- 4 Minimum 40% Affordable Housing in accordance with Policy L3
- 5 Minimum overall net density 40 dwellings per hectare
- 6 Housing size type and mix as set out in Policy L1 and Appendix 6
- 7 Strategic and local public open space, including managed woodland and ecological network links
- 8 Countryside access links including improved off-road paths (rights of way) and links to a community food zone retained in the Green Belt
- 9 A substantial new Country Park providing facilities for new and existing communities and a permanent green buffer to Redbourn
- 10 Retention of important trees and landscape features
- 11 A 3FE primary school, including Early Years provision, to serve the new community
- 12 An 8FE secondary school to serve the new and existing communities
- 13 Transport network (including walking and cycling links) and public transport services upgrades/improvements
- 14 3% of homes provided to be self-build housing
- 15 New neighbourhood and local centres, including commercial development opportunities
- 16 Recreation space and other community facilities, including health provision
- 17 Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands 18 Excellence in design, energy efficiency and water management
- 19 Appropriate renewable energy production and supply mechanisms
- 20 Appropriate buffer zones and mitigations to address the Buncefield oil depot and pipelines
- 21 Design to mitigate adverse impacts from motorway noise and air pollution.

5. Outstanding Matters

The following limited outstanding matters remains between the parties, in regard to Policy S6 (i):

- S6 (i) 14 3% of homes provided to be self-build housing TCE view as per Reg 19 rep 51946 page 208 'No justilication for 3% self-build figure'
- 2 The Green Belt boundary TCE view as per Reg 19 rep 51946 page 207 'Built development boundary should be amended to be in line with SLR plan L2'
- 3 S6 (i) 12 An 8FE secondary school to serve the new and existing communities TCE view 'TCE query whether the Secondary School should remain in the Green Belt?'

6. Masterplanning and Delivery

The parties confirm their willingness to progress a timely planning application in order to meet (or come forward sooner than) the programme of completions in the plan housing trajectory. The Parties have agreed a Planning Performance Agreement (PPA) as set out in Appendix 3. Since the start of the PPA process in 2018, SADC, DBC and HCC have worked towards submitting a planning application for the whole of S6(i) and (ii) and the northern part of S6(iii) In the Spring of 2020, with the application being

considered by Members later in 2020. The PPA process is assisting in bringing forward the Broad Location in accordance with S6(i). Whilst still undergoing significant further iteration generally through the process set out in the Strategic and Sites Masterplanning Toolkit, including responding to public engagement, an indicative Masterplan can be seen at Appendix 4.

7. Appendices

- 1. Local Plan Developer / Site Promoter Response Proforma
- 2. A plan of the directly relevant area controlled/owned by TCE
- 3. Agreed PPA
- 4. Indicative masterplan



Dated: N 12 19



9.12.19

Chris Briggs
Spatial Planning Manager
St Albans City and District Council

Proforma Responses by Landowner/Developer

Broad Location(s):	Sites S6(i), (ii), (iii) and (iv)
Developer / Promoter:	The Crown Estate

1. The draft Broad Location is 'available' There are no issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc.	Yes	Any Commentary: The Crown Estate is actively promoting the locations for development and confirm that they are available with no known constraints prohibiting the delivery of the allocations proposed. The Crown Estate owns the freehold of sites S6(i), (ii) and (iii). It is in active discussions with the owners of S6(iv) who are supportive of the sites inclusion within the emerging Local Plan.
2. The draft Broad Location is 'Deliverable / Achievable' There is a reasonable prospect that the development, including all key aspects being assessed as part of the overall 'package' proposed, is viable and deliverable	Yes	Any Commentary: The sites are deliverable: Significant promotion and consultation work has bene completed over the last 4 years and it is the intention of the Crown Estate to submit an outline application for early phases to support the Local Plan process. The land for 3 of the 4 locations is in the ownership of the Crown Estate who promote land across the country for residential and employment development.

The proposed schemes are viable and can deliver the components of the allocation specific policies as currently drafted.

The sites can contribute towards key infrastructure such as improvements to Breakspear Roundabout and Junction 8 (as set out in the Maylands Growth Corridor Study), but TCE anticipate that other sources of funding and scheme contributions will be made available for these sub regionally important items.

3. The relevant draft Local Plan Policy requirements are acceptable and achievable

This includes specifically Policies L1 Housing Size, Type, Mix and Density; L2 Provision of Older Persons Housing and Special Needs Housing; and L3 - Provision of and Financial Contributions towards Affordable Housing (including specified mix of 'social rent', 'affordable rent' and 'subsidised home ownership') This also includes the matrix in Appendix 1 for Housing Mix / Tenure

Yes

Any Commentary:
The proposed schemes can deliver 40% affordable housing subject to viability and the delicate balance between delivering infrastructure and housing concurrently.

TCE broadly supports the suggested mix of 30% social rent, 30% affordable rent and 40% subsidised home ownership.

TCE intends to select a Registered Provider during each phase of the scheme to ensure that the quality, delivery and management of affordable homes remains high.

The exact mix of units for each tenure type will need detailed assessment through the Strategic Housing Market Assessment which will need to be updated regularly throughout the Local Plan period and the lifetime of the schemes. Any planning

	application will reflect the needs assessment relevant at that time.
4. The relevant draft Broad Location policy requirements (S6 – individual Broad Location as applicable) are acceptable and achievable.	Any Commentary: See below – Question 4 commentary
5. The relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) are acceptable and achievable	Any Commentary: See below – Question 5 commentary
6. The 'deliverable / achievable' community benefits (of all relevant kinds) to help the Council in consideration of 'exceptional circumstances', including any 'additionality' or 'beyond standard' elements, are considered to be (listed in brief, no specific limit on number):	1 Provision of a Secondary School 2 Package of Nickey Line enhancements (includes Redbourn) 3 Country Park 4 Multi modal interchange 5 Making provision for a wider Hemel Hempstead link road from Leighton Buzzard Road to M1 J8.
7. Any other important considerations which the Council should be aware of	None

Question 4 commentary. : S6 Requirements

The Broad Location requirements for sites S6(i), (ii) (iii) and (iv) are acceptable in principle. However, The Crown Estate (TCE) reserves the right to submit representations on the following points:

- Masterplanning TCE has already held public consultation events that have led to the masterplan evolving. Details can be found at http://easthemel.co.uk/. Significant consultation has also occurred with many statutory stakeholders to ensure that the masterplan reflects the needs of others and is deliverable. TCE are now holding regular pre-application meetings with SACDC officers, including the in-house masterplanner, to finalise the masterplan.
- Affordable Housing As stated above, the tenure split outlined in policy L3 is broadly acceptable to TCE albeit that the exact mix of unit types need to be determined via an up to date and robust Strategic Housing Market Assessment (SHMA) and at each application stage.
- 3. Self build plots TCE encourages flexible delivery of homes and is happy to provide a limited number of self-build plots subject to demand and needs based evidence as well as S106 details regarding delivery and take up.

Furthermore, TCE reserves the right to submit representations on the following details in respect of the Central Employment Zone (S6(ii))

S6(ii) (4 and 5) The land area split between B1 and B2 / B8 uses is too inflexible to accommodate employment change over the next 18 years

 S6(ii) (ii) TCE support the use of exceptional environmental opportunities but CHP should be used as an example and not a requirement since technology will evolve and CHP may not be the most appropriate technology.

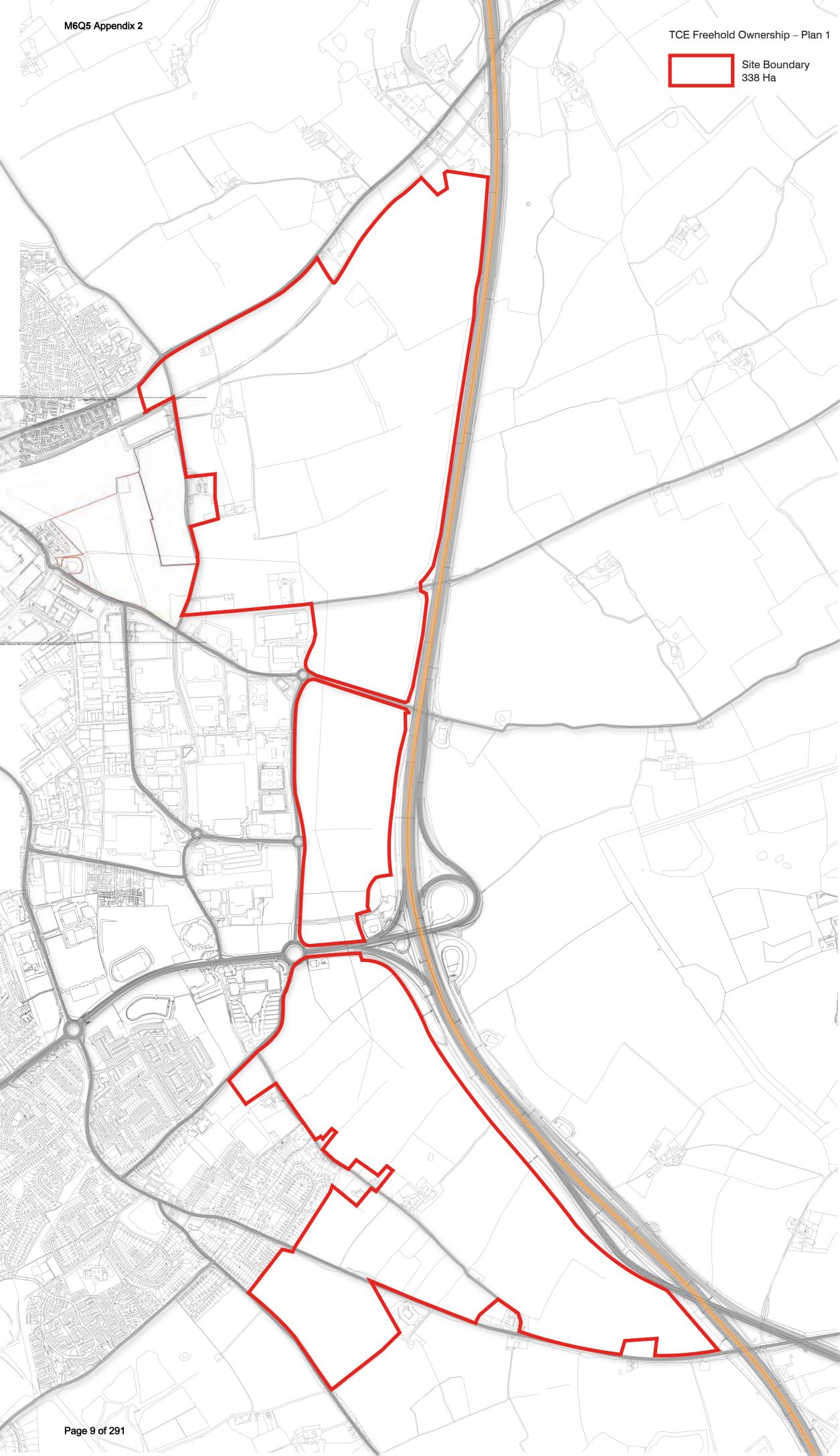
Question 5 commentary. : Policy Map Requirements

TCE accepts the broad conclusions of the SKM report but consider that the definition of detailed Green Belt boundaries does not reflect the guidance in the NPPF or the detailed master planning work that has been discussed with SADC. The detailed changes proposed by TCE are:

- S6(i) Rather than following the line of the overhead power lines, the Green Belt boundary should follow the built edge of the master plan development edge. This would show the Secondary School buildings and the inverted triangle of housing south of the Secondary School as excluded from the Green Belt
- S6(iii) A more robust and NPPF compliant Green Belt boundary would be to follow the A4147 to where it crosses the M1. Taking all this land out of the Green Belt does not imply that all this land will be developed. It is also considered that land south of Leverstock Green between the A4147 and Bedmond Road needs to be excluded from the Green Belt if the desired housing capacity is to be achieved. TCE is willing to share its capacity calculations with SADC+
 - S6(iv) Whilst TCE has no specific boundary proposal in this area, it is felt that a Green Belt boundary which follows the overhead power lines is not NPPF compliant. Traditional field boundaries would be more appropriate.

There are also two non-Green Belt comments on the Proposals Map:

- In area S6(i) the Secondary School notation extends too far south
- The area shown for M1 J8 improvements needs to be larger to include associated works (ie. drainage).



PLANNING PERFORMANCE AGREEMENT

IN RELATION TO A PLANNING APPLICATION AT LAND EAST OF HEMEL HEMPSTEAD

- 1. This Planning Performance Agreement (PPA) is made on the 7th day of August 2019 between
 - a) St Albans City and District Council (SADC)
 - b) Dacorum Borough Council (DBC)
 - c) Hertfordshire County Council (HCC)

And the 'Developer'

- d)The Crown Estate (TCE).
- 2. In this PPA, the planning application at Land East of Hemel Hempstead is referred to as "the Development."
- 3. SADC and DBC are the local planning authorities for development within the area, set out in Schedule 1, in which the Development, set out in Schedule 2, is located. HCC is a statutory consultee. HCC has prepared the Local Transport Plan and is the highway authority for the Hertfordshire Area and statutory consultee with responsibility for delivery of a range of services.
- 4. This PPA is made pursuant to Section 111 of the Local Government Act 1972, Section 2 of the Local Government Act 2000 and Section 93 of the Local Government Act 2003.
- 5. 'Land East of Hemel Hempstead' Planning Application

Recitals

- 5.1. The Developer intends to submit a cross boundary Outline Planning Application (the "Planning Application") for the Development to SADC and DBC. The same application and supporting documents will be submitted to SADC and to DBC.
- 5.2. The Developer has entered into pre-application discussions with SADC and DBC regarding the Development. The Developer has also entered into pre-application discussions with HCC regarding the Development.

- **5.3.** The Planning Application will be in outline with some matters reserved for future consideration through reserved matters applications (see Application Description at Schedule 2).
- **5.4.** The Planning Application will be accompanied by such of the Application Documents (specified in Schedule 3) as are reasonably required by the local planning authorities.
- **5.5.** The parties wish to ensure that the pre-application discussions and the Planning Application are considered in a timely manner and as expeditiously as is practicable, having regard to the overall timetable set out in this PPA and compliance with relevant statutory procedures.
- **5.6.** As part of the process of considering and determining the planning application, SADC and DBC will share relevant information with the Hertfordshire Local Enterprise Partnership (LEP) and seek their comments where appropriate, albeit the LEP is not a signatory to the PPA.
- **5.7.** SADC and DBC are to work jointly under this PPA during the pre-application negotiations, notwithstanding that the majority of the development site sits outside DBC's administrative area.
- **5.8.** This PPA seeks to agree broad requirements, timescales and a charging schedule for:
 - a) The pre-application process (including Masterplanning of the Development) for SADC, DBC AND HCC;
 - b) The post planning application submission process (with charging for DBC and HCC only);
- **5.9.** The consideration and determination of the Planning Application for the purposes of providing the parties with a level of certainty as to the process and timescale to be followed. In this PPA, the parties agree to extend the statutory determination period for the Planning Application.
- **5.10.** Given the scale and complexity of the project it is acknowledged that requirements, and the project programme, will evolve over time.
- **5.11.** This PPA will not fetter SADC or DBC in exercising their statutory duties as local planning authority. It will not prejudice the outcome of the Planning Application or the impartiality of DBC, SADC or HCC in its role as a statutory and advisory consultee.
- **5.12.** This PPA shall not restrict or inhibit the Developer from exercising its right of appeal under Section 78 of the Town and Country Planning Act 1990.

- 5.13. The Developer, SADC, DBC and HCC have agreed to enter into this PPA to cover the pre-application / masterplanning of the Development, and outline planning application stages and for DBC and HCC to the assessment and processing of outline application up to the determination of the related application.
- **5.14.** This PPA will ensure that determination of the application is in accordance with a timeframe as agreed and acknowledged by all parties in advance, and would remove the application from the normal statutory target for determination.
- **5.15.** The Developer shall not seek to reclaim the statutory planning application fees paid to SADC and DBC in the event that the planning application is not determined within a period of 26 weeks from the date of registration of the application.
- **5.16.** Reasonable endeavours will be used to ensure that the parties meet an agreed programme for the pre-application and application processes. The key target project milestones are:
 - PPA Workshops August 2019 February 2020
 - Public Consultation on Masterplan November 2019
 - DRP December 2019
 - Masterplan layout to SADC PPC December 2019 / January 2020
 - Masterplan layout to SADC Cabinet January / February 2020
 - Earliest Agreed Submission Date Mid March 2020
- **5.17.** The programme for PPA Workshops will be reviewed quarterly and held outside of this PPA agreement. These will include topic based workshops and s106/infrastructure workshops.
- 5.18. In the event that the Developer is dissatisfied with any part of the service provided by SADC and DBC, the Developer shall in the first instance raise the concerns in writing to: SADC's Development Management Manager and/or DBC's Assistant Director (Planning, Development & Regeneration) who shall seek to resolve the issues. If the issues cannot be resolved, then the Developer shall use the Council's internal complaints process.
- **5.19.** It is acknowledged that outside this PPA the Developer will need to consult with and seek authority from their Boards, committees and other decision makers pursuant to their schemes of delegation.

Terms and Objectives, including Timescales

5.20. This PPA will apply from 1st December 2018 and shall remain in force until the determination of the outline planning application unless terminated earlier.

- **5.21.** The Parties agree to extend the statutory determination period for issuing the planning decision notices and signing the S106 as follows:
 - Application submitted following pre-application process in accordance with a programme of pre-application meetings to be agreed, and reviewed as necessary (see Appendix 2);
 - Reporting of the application to planning committees at SADC and DBC within 26 weeks of the validation of the application (unless extension agreed as per Clause 5.15), unless an extension to this is agreed in advance between the parties;
 - Signing of the associated s106 Agreement (with phasing strategy and subject
 to all parties approving the same) if a full first draft is made available to all
 parties before or during the validation, and issuing of the decision notices
 within 12 weeks of the latter of the two committee resolutions arising from the
 meeting referred to above", unless an extension is agreed between the parties
- **5.22.** A separate undertaking of legal costs in relation to the s106 Agreement will be required in advance, for each Authority. This is separate to the fee associated with this PPA.
- **5.23.** The main topics for consideration in this PPA are set out in Appendix 1 of this PPA. It is not necessarily an exhaustive list and may be revised as discussions progress.
- **5.24.** The parties agree to use reasonable endeavours to hold a series of workshops in order to, as far as reasonably possible, resolve issues prior to the submission of an application. The programme, structure, scope and content of these workshops will be set out in a programme to be agreed between the parties and subject to regular review.
- **5.25.** The parties agree that a further Design Review Panel process shall be undertaken prior to the submission of the application, this being additional to the 3 PPA workshops and Design Panel Review held in February 2019.
- **5.26.** The Council would suggest that the following external consultees are key to be engaged with the proposals at pre-application stage;
 - Hertfordshire Local Enterprise Partnership
 - Highways England
 - Environment Agency
 - Historic Environment Unit (Archaeology)/ SADC's District Archaeologist

- Natural England
- Thames Water
- Health and Safety Executive
- Local residential and business community and key interest and user groups
- NHS
- Hertfordshire and Middlesex Wildlife Trust
- British Pipeline Association (BPA)
- NATS (regarding flightpaths)
- UKPN
- Hertfordshire County Council
 - Growth and Infrastructure Unit
 - Highways
 - Ecology
 - Countryside Access and Rights of Way
 - Lead Local Flood Authority
 - Education
 - Waste
 - o Fire and Rescue
 - o Adult Care Services
 - o Public Health
 - Early years
 - o Youth
 - Libraries

Amendment and Review

5.27. The PPA shall be subject to review as may be agreed between the Developer, SADC, DBC and HCC and any agreed variation of its terms shall be evidenced in writing, signed by all parties. This can be via email with a standard short form which would be read alongside this PPA. An example of the extension form is included at Schedule 7.

Breach and Termination

- **5.28.** Provided always that any breach is within the control of the party that is in breach, if any party considers that:
- a) the circumstances that brought about this PPA no longer apply;
- b) the principles and intentions of this PPA are not being followed; or
- c) there is a material failure by the other party to comply with the terms of this PPA;

it will draw their concerns to the attention of the other parties. The other parties will then have a period of not less than 10 working days within which to comment on and/or address the concerns. If the concerns are not addressed, the first party may then terminate this PPA at any point following the expiry of that period.

- **5.29.** The PPA will also be terminated where:
- a) the Developer submits an appeal under Section 78 of the Town and Country Planning Act 1990 in relation to the Planning Application (for whatever reason);
- b) the Planning Application is called in for determination by the Secretary of State under S77.
- **5.30.** The Developer reserves the right to terminate this PPA agreement at any time subject to the payment of any outstanding fees for work undertaken by the Parties and any agreed work undertaken third parties up to the date of termination.
- **5.31.** Any other signatory reserves the right to terminate this PPA at any time.

Joint Working

5.32. All Parties shall act with fairness and good faith in respect of all matters related to the pre-application process and the handling of the Planning Application and will work jointly in complying with their respective obligations under this PPA. The Developer, HCC, SADC and DBC will establish a Project Team which will be responsible for progressing the pre-application and Planning Application. The Project Team will include individuals identified in Schedule 6 who will work together as much as possible cooperatively in accordance with the obligations below and performance standards set out in Schedules 4 and 5.

Developer's Obligations

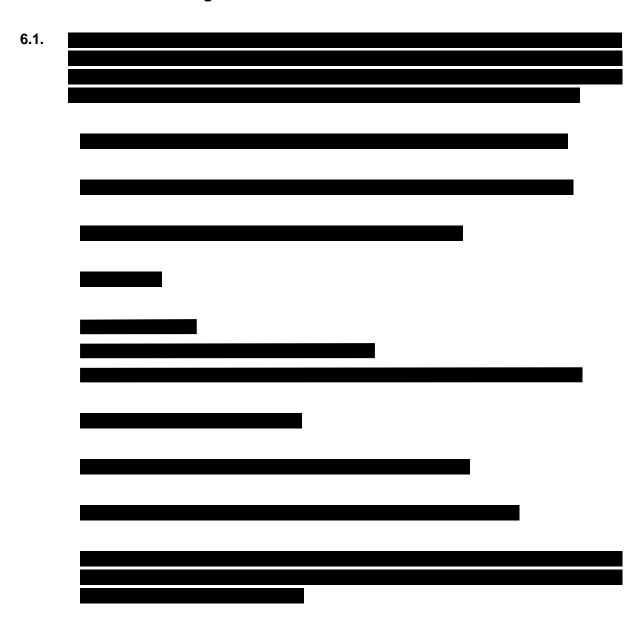
- **5.33.** The Developer agrees to use its reasonable endeavours to:
 - a) submit the Planning Application to SADC and DBC for the Development (set out in Schedule 2);
 - b) submit such of the Application Documents (set out in Schedule 3) as are required by the local planning authority, in the format requested with the Planning Application when they are submitted;
 - c) comply with the Performance Standards (set out in Schedule 4);
 - d) designate the Developer's Project Team lead person and other team members as identified in Schedule 6. The designated lead person and others as required will attend all pre-application and Project Team meetings.

HCC, SADC's and DBC's Obligations

5.34. Without prejudice to their other obligations as the local planning authorities, SADC and DBC and HCC as a statutory and advisory consultee and statutory

provider of services, agree to work cooperatively in progressing the preapplication and Planning Application and complying with its obligations under this PPA and to use its reasonable endeavours to:

- a) each designate a Project Team lead officer and other officers as identified in Schedule 6. The designated lead officer and others as required will attend all pre-application and Project Team meetings and shall be responsible for overseeing and carrying out the functions in accordance with this PPA;
- b) comply with the Performance Standards (set out in Schedule 5); and



6.2. The fees outlined above relate to work to be undertaken only in respect of the Development at East Hemel Hempstead and do not include any work to be undertaken in respect of Hemel Garden Town. It is acknowledged, however,

that there are important interrelationships, and that LEHH staff will need an awareness of HGT work streams and their interlinkages with "Phase 1", in order to be able to progress the LEHH project.

- 6.3. Subject to 6.4, the monthly retainer and HCC's charges are payable from the 1st December 2018 until such time as the planning application is submitted or determined dependent on the relevant PPA party. Separate invoices will be raised by each authority, and the Developer agrees to pay monthly.
- **6.4.** For the period 1st December 2018 until 31st July 2019, the fees payable are:



- **6.8.** From 1st December 2018, the Developer has engaged in pre-application discussions with SADC, DBC and HCC including PPA Workshops held on 4th 6th February 2019 and formal Design Panel Review led by Design South East on 19th February 2019.
- **6.9.** This PPA relates to the outline planning application only. An additional fee may be required for resourcing of reserved matters applications, discharge of condition applications and post commencement monitoring.
- **6.10.** In addition to the monthly fees, it will be necessary for the Authorities to procure external services, which may be pre or post application (or both) and will include but may not necessarily be limited to:
 - 6.10.1.Landscape Consultant;
 - 6.10.2. Sustainability Consultant;
 - 6.10.3. Viability Consultant;
 - 6.10.4.Legal Consultant to support S106 including covering the legal costs of supervisory legal time to procure legal support from each of the authorities that are signatories to the agreement,.
- **6.11.** Procurement of external services will be carried out by SADC as lead authority, except where it is necessary to have separate procurements (such as in the case of legal procurement where each authority will need representation).

A brief for the procurement of all external services will be discussed and agreed by all of the authorities in advance with the Developer, including a cap on fees.

6.12. The Developer agrees to pay the cost of procuring the external services in full, a schedule for such payment is to be agreed and appended to this PPA at the appropriate time. Payment of any external services will be at pre-agreed stages, agreed at procurement stage.

The justification for the monthly retainers and hourly rate approach for HCC outlined above (as opposed to a fixed amount) is in relation to the complexities and uncertainties of the project and the uncertainties around the detail of the pre-application programme.

6.13. Prior to submission of the planning application subject of this PPA, SADC and DBC will carry out a pre-submission validation review at a charge of £500 plus VAT payable in advance to each authority.

7. Confidentiality

7.1.1. All parties are governed by the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 in how they handle the information that they hold.

8. Legal Effect

8.1.1. For the avoidance of doubt this PPA is not intended to be legally binding.

SIGNATURES

Signed by the parties or their duly authorised representatives:

The Crown Estate

Signed:



Title & Full Name: John Grinnell, Deputy Head of Development & Project Management

Date: 8th August 2019

St Albans City & District Council

Signed by:



Title & Full Name: Tracy Harvey, Head of Planning and Building Control

Date: 6th August 2019

Dacorum Borough Council

Signed by:



Title & Full Name...James Doe, Assistant Director – Planning, Development and Regeneratiion

Date:...07 August 2019...

Hertfordshire County Council	
Signadi	
Signed:	

Title & Full Name Sarah McLaughlin, Head of the Growth and Infrastructure Unit. Date: 06 August 2019.....

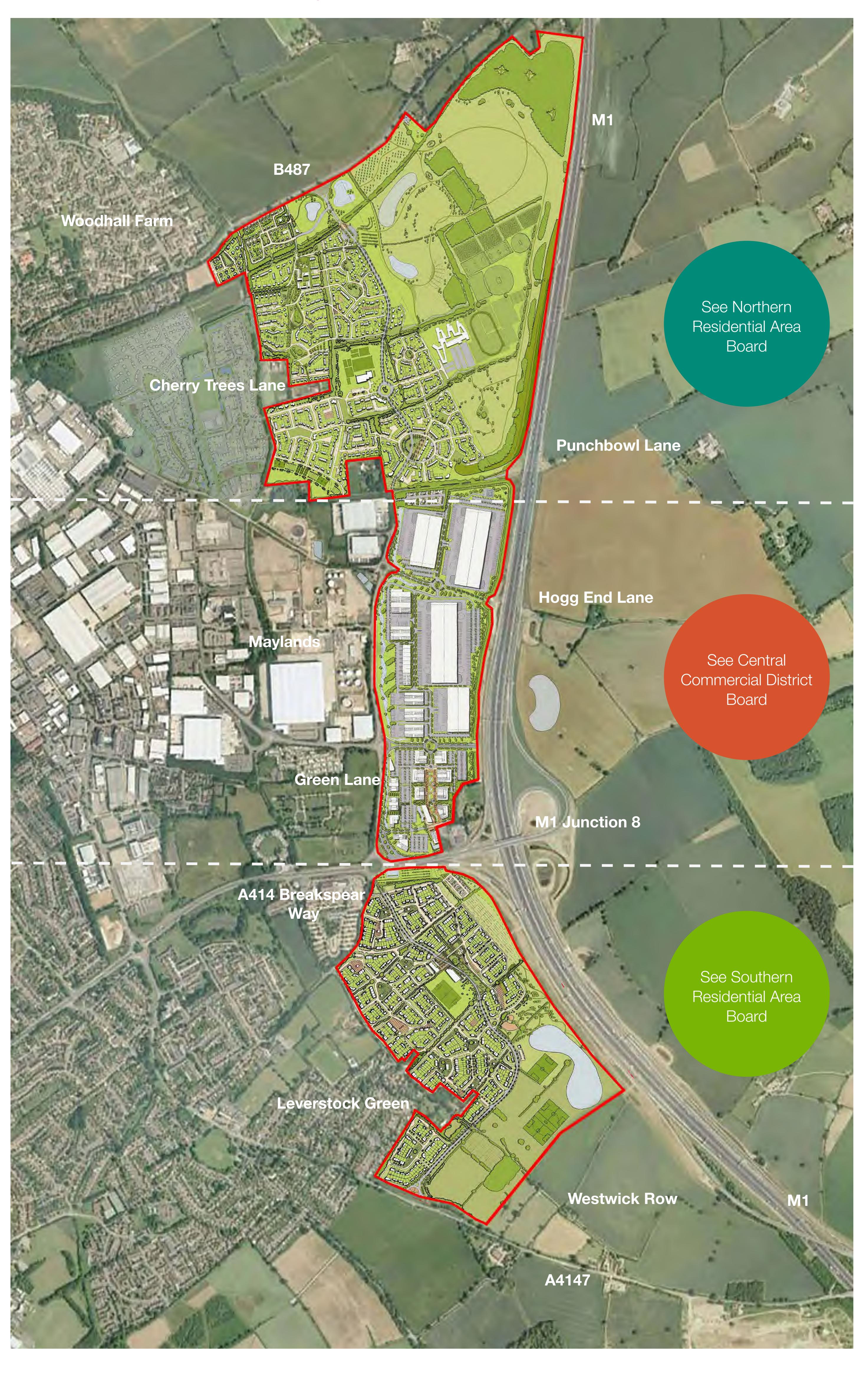
East Hemel



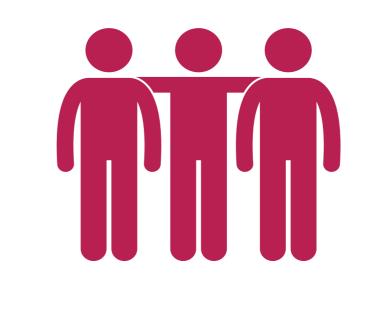
Proposed masterplan

We have developed a masterplan that reflects feedback from the previous public consultation. It also addresses feedback from SADC and other key consultees such as the Highways Authority.

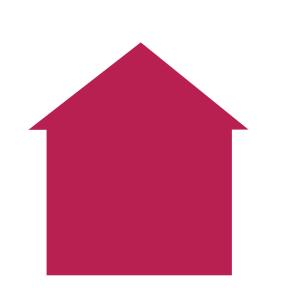
Our proposed development area is larger than the site allocated in SADC's SLP. This is because our own technical work and the site's constraints have shown that it would not be possible to deliver the required 2,500 homes — while also delivering a scheme which reflects the character and density of the surrounding area — in the area allocated by SADC.



Our masterplan will deliver



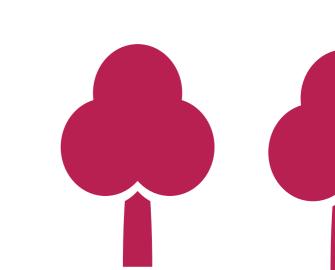
Three distinct areas delivered as one scheme



2,500 new homes,1,000 of which will be affordable



55 hectares of new, flexible employment space



A landscape-focused approach that seeks to retain existing hedgerows, trees and





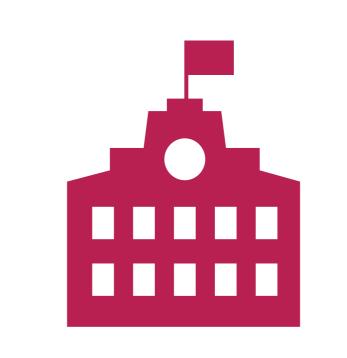
Sensitivity to the different characters of Woodhall Farm and Leverstock Green



field boundaries

to the different

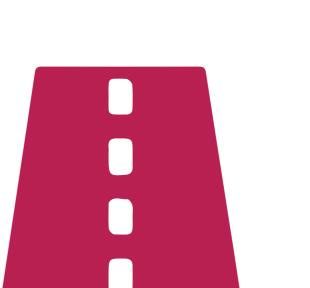
New primary and secondary schools
Leverstock



'Local centres' within each of the three areas



Two new country parks that are easily accessible



Improved highways

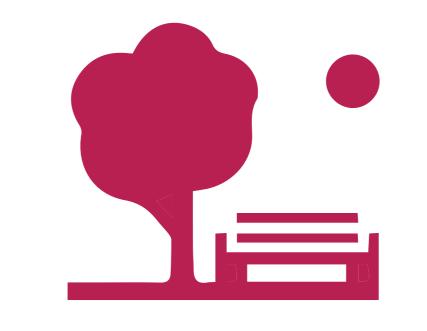
and bus services, so the wider community can benefit from development at East

Hemel

parks



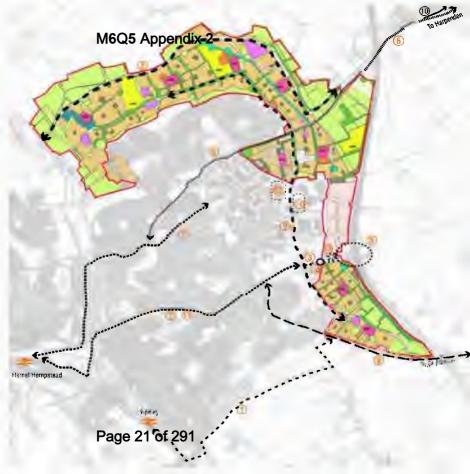
Pre-school and after school care either as part of the new schools or provided separately



A necklace of green spaces
that connect each area
together, enabling the wider
community to walk or cycle
through the development
and access the country



Two travellers sites as required by the local authority



St Albans Local Plan - Statement of Common Ground between St Albans City & District Council (SADC) and the Crown Estate (TCE) - East Hemel Hempstead (Central) Broad Location (S6 ii)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC) and The Crown Estate (TCE) in relation to the Local Plan Broad Location S6 (ii) – East Hemel Hempstead (Central). It concisely considers areas of agreement between the parties following the TCE's representations on the St Albans Draft Local Plan in order to confirm the soundness and robustness of the Broad Location. It is anticipated that further agreed detail may be available by the time of the commencement of the Local Plan Hearing session on 21 January 2020.

The agreed matters in this SOCG do not preclude any further written or verbal representations that the District Council and TCE may wish to make as part of the Local Plan Examination.

TCE is working collaboratively, cooperatively, proactively and productively with SADC and all relevant partners to bring the site forward for development as set out in Policy S6 (ii).

It is important to also consider alongside this document the signed Local Plan Developer / Site Promoter Response Proforma 2018 as set out at appendix 1.

2. Legal Compliance; Duty to Co-operate and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

The parties consider that the Local Plan is legally compliant and consistent with the principles of the National Planning Policy Framework (2019). It is considered that St Albans City & District Council has fulfilled the Duty to Co-operate and that the Local Plan has been prepared in accordance with the timetable set out in the Local Development Scheme. Furthermore, it is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement and appropriate bodies have been consulted. A comprehensive and robust Sustainability Appraisal has also been carried out to support the Local Plan.

3. The Site

The site S6 ii) is shown on the Draft Local Plan Policies Map (CD003) and a map of the directly relevant area controlled/owned by TCE is given in Appendix 2.

4. Broad Location for Development

The parties for the site agree that Policy S6 (ii) is sound and robust in principle and evidence shows that all requirements can and will be delivered at the point in time currently envisaged in the Plan:

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 ii) - East Hemel Hempstead (Central) Broad Location

Objective

To provide a major new Enviro-Tech focused employment location, including enhanced transport infrastructure for new and existing employment and residential areas.

Proposals

The development will be required to deliver:

- Masterplanned development led by the Council in collaboration with Dacorum Borough Council, local communities, landowners and other stakeholders
- 2 Accordance with the aims and status of the Hertfordshire Enviro-Tech Enterprise Zone to deliver both Enviro-Tech Businesses and environmentally friendly buildings
- 3 Employment provision for a range of uses including: offices, research and development, light industrial and logistics; within the approximately 55 Ha area north of Breakspear Way and south of Punchbowl Lane
- 4 A significant new Business Park consisting primarily of B1 office accommodation on the southern approximately 17 Hectares of the site
- A significant new logistics and mixed industrial area on the northern approximately 38 Hectares of the site
- 6 Sufficient variety of employment uses must be provided over time to offer in the order of 10,000 jobs. Over-concentration of low employment generating logistics uses will not be permitted
- 7 The first phase of employment development will be required to provide some starter units / incubator space
- 8 Retention of important trees and landscape features
- 9 A new link road from M1 junction 8 to the Green Lane/Boundary Way roundabout
- 10 Multi-Modal Transport Interchange with facilities to encourage and facilitate modes of transport other than the private car
- 11 Use of the exceptional environmental opportunities provided by this scale of employment development including Combined Heat & Power and large scale solar power generation
- 12 One 15 pitch Gypsy and Traveller site
- 13 Full exploration of possibilities for an offsite construction facility (primarily for modular housing) within the logistics and mixed industrial area
- 14 Appropriate buffer zones and mitigalions to address the Buncefield oil depot and pipelines
- 15 Design to mitigate adverse impacts from motorway noise and air pollution

5. Outstanding Matters

The following limited outstanding matters remains between the parties, in regard to Policy S6 (ii)

- S6 (ii) 6 Sufficient variety of employment uses must be provided over time to offer in the order of 10,000 jobs. Over-concentration of low employment generating logistics uses will not be permitted TCE view as per Reg 19 rep 51946 page 225 Support provision of a variety jobs, but figure of 10 000 jobs should be deleted as is only speculative at this stage with no evidential basis apparent
- S6 (ii) 4 / 5 A significant new Business Pa k consisting primarily of B1 office accommodation on the southern approximately 17 Hectares of the site / A significant new logistics and mixed industrial area on the northern approximately 38 Hectares of the site TCE view as per Reg 19 rep 51946 page 225 Split between primarily B1 and mixed industrial uses is too prescriptive/inflexible. Flexibility is needed over the plan period
- 3 M1 junction 8 TCE View TCE seeking clarification that S6(ii) in isolation does not trigger the need for the M1 J8 improvement. However, the policy area needs to safeguaid the land for the improvement

6. Masterplanning and Delivery

The parties confirm their willingness to progress a timely planning application in order to meet (or come forward sooner than) the programme of completions in the plan housing trajectory. The Parties have agreed a Planning Performance Agreement (PPA) as set out in Appendix 3. Since the start of the PPA process in 2018, SADC, DBC and HCC have worked towards submitting a planning application for the whole of S6(i) and (ii) and the northern part of S6(iii) in the Spring of 2020, with the application being considered by Members later in 2020. The PPA process is assisting in bringing forward the Broad Location in accordance with S6(ii). Whilst still undergoing significant further iteration generally through the process set out in the Strategic and Sites Masterplanning Toolkit, including responding to public engagement, an indicative Masterplan can be seen at Appendix 4.

7. Appendices

- 1. Local Plan Developer / Site Promoter Response Proforma
- A plan of the directly relevant area controlled/owned by TCE
- 3. Agreed PPA
- 4. Indicative Masterplan



9.12.19

Chris Briggs
Spatial Planning Manager
St Albans City and District Council

Proforma Responses by Landowner/Developer

Broad Location(s):	Sites S6(i), (ii), (iii) and (iv)
Developer / Promoter:	The Crown Estate

1. The draft Broad Location is	Yes	Any Commentary:
'available' There are no issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc.		The Crown Estate is actively promoting the locations for development and confirm that they are available with no known constraints prohibiting the delivery of
	*Lee i fiji	the allocations proposed. The Crown Estate owns the freehold of sites S6(i), (ii) and (iii). It is in active discussions with the owners of S6(iv) who are supportive of the sites inclusion within the emerging Local Plan.
2. The draft Broad Location is 'Deliverable / Achievable' There is a reasonable prospect that the development, including all key aspects being assessed as part of the overall 'package' proposed, is viable and deliverable	Yes	Any Commentary: The sites are deliverable: Significant promotion and consultation work has bene completed over the last 4 years and it is the intention of the Crown Estate to submit an outline application for early phases to support the Local Plan process. The land for 3 of the 4 locations is in the ownership of the Crown Estate who promote land across the country for residential and employment development.

The proposed schemes are viable and can deliver the components of the allocation specific policies as currently drafted.

The sites can contribute towards key infrastructure such as improvements to Breakspear Roundabout and Junction 8 (as set out in the Maylands Growth Corridor Study), but TCE anticipate that other sources of funding and scheme contributions will be made available for these sub regionally important items.

3. The relevant draft Local Plan Policy requirements are acceptable and achievable

This includes specifically Policies L1 Housing Size, Type, Mix and Density; L2 Provision of Older Persons Housing and Special Needs Housing; and L3 - Provision of and Financial Contributions towards Affordable Housing (including specified mix of 'social rent', 'affordable rent' and 'subsidised home ownership') This also includes the matrix in Appendix 1 for Housing Mix / Tenure

Yes

Any Commentary:
The proposed schemes can deliver 40% affordable housing subject to viability and the delicate balance between delivering infrastructure and housing concurrently.

TCE broadly supports the suggested mix of 30% social rent, 30% affordable rent and 40% subsidised home ownership.

TCE intends to select a Registered Provider during each phase of the scheme to ensure that the quality, delivery and management of affordable homes remains high.

The exact mix of units for each tenure type will need detailed assessment through the Strategic Housing Market Assessment which will need to be updated regularly throughout the Local Plan period and the lifetime of the schemes. Any planning

	application will reflect the needs assessment relevant at that time.
4. The relevant draft Broad Location policy requirements (S6 – individual Broad Location as applicable) are acceptable and achievable.	Any Commentary: See below – Question 4 commentary
5. The relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) are acceptable and achievable	Any Commentary: See below – Question 5 commentary
6. The 'deliverable / achievable' community benefits (of all relevant kinds) to help the Council in consideration of 'exceptional circumstances', including any 'additionality' or 'beyond standard' elements, are considered to be (listed in brief, no specific limit on number):	1 Provision of a Secondary School 2 Package of Nickey Line enhancements (includes Redbourn) 3 Country Park 4 Multi modal interchange 5 Making provision for a wider Hemel Hempstead link road from Leighton Buzzard Road to M1 J8.
7. Any other important considerations which the Council should be aware of	None

Question 4 commentary. : S6 Requirements

The Broad Location requirements for sites S6(i), (ii) (iii) and (iv) are acceptable in principle. However, The Crown Estate (TCE) reserves the right to submit representations on the following points:

- Masterplanning TCE has already held public consultation events that have led to the masterplan evolving. Details can be found at http://easthemel.co.uk/. Significant consultation has also occurred with many statutory stakeholders to ensure that the masterplan reflects the needs of others and is deliverable. TCE are now holding regular pre-application meetings with SACDC officers, including the in-house masterplanner, to finalise the masterplan.
- Affordable Housing As stated above, the tenure split outlined in policy L3 is broadly acceptable to TCE albeit that the exact mix of unit types need to be determined via an up to date and robust Strategic Housing Market Assessment (SHMA) and at each application stage.
- 3. Self build plots TCE encourages flexible delivery of homes and is happy to provide a limited number of self-build plots subject to demand and needs based evidence as well as S106 details regarding delivery and take up.

Furthermore, TCE reserves the right to submit representations on the following details in respect of the Central Employment Zone (S6(ii))

S6(ii) (4 and 5) The land area split between B1 and B2 / B8 uses is too inflexible to accommodate employment change over the next 18 years

 S6(ii) (ii) TCE support the use of exceptional environmental opportunities but CHP should be used as an example and not a requirement since technology will evolve and CHP may not be the most appropriate technology.

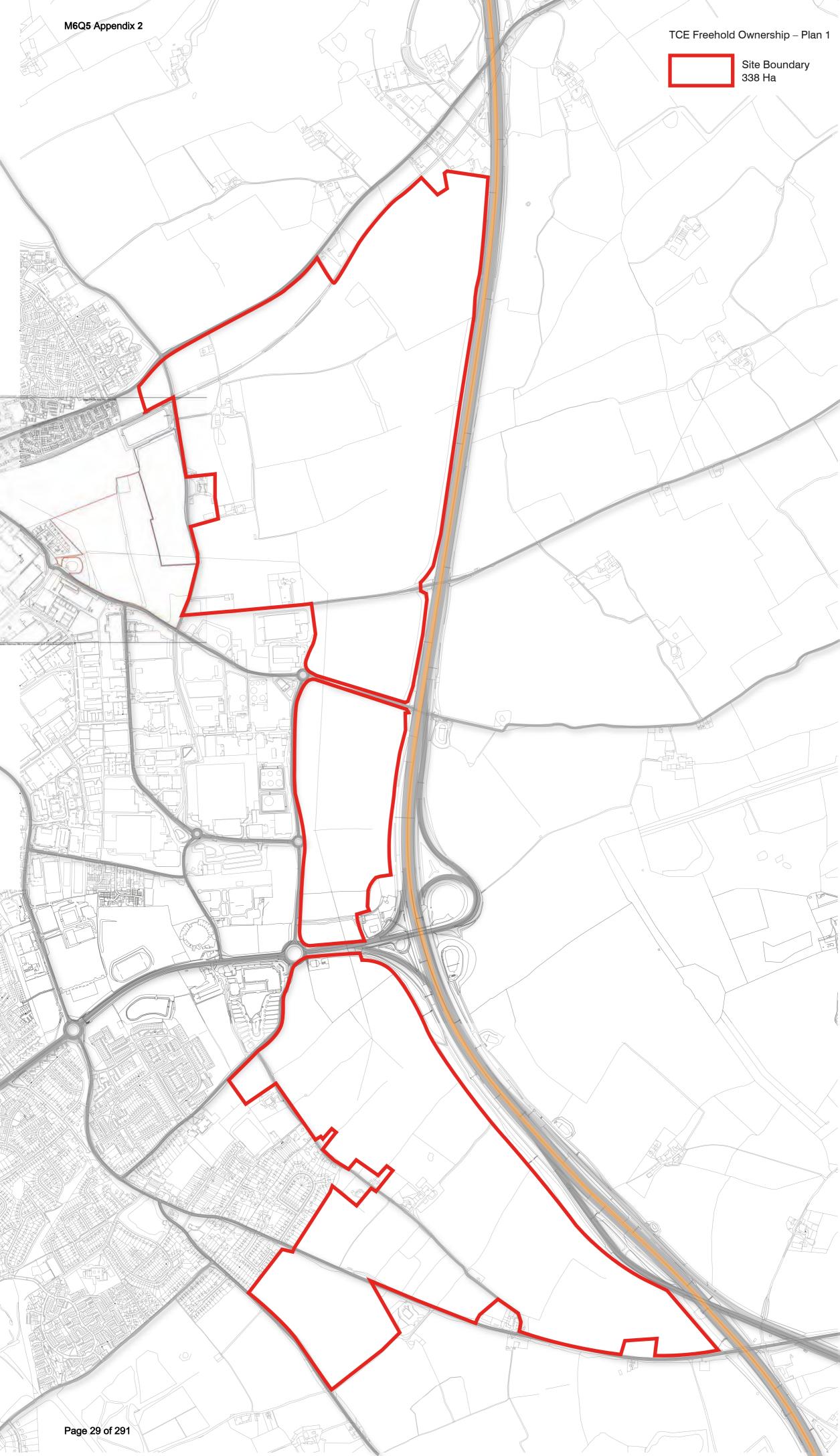
Question 5 commentary. : Policy Map Requirements

TCE accepts the broad conclusions of the SKM report but consider that the definition of detailed Green Belt boundaries does not reflect the guidance in the NPPF or the detailed master planning work that has been discussed with SADC. The detailed changes proposed by TCE are:

- S6(i) Rather than following the line of the overhead power lines, the Green Belt boundary should follow the built edge of the master plan development edge. This would show the Secondary School buildings and the inverted triangle of housing south of the Secondary School as excluded from the Green Belt
- S6(iii) A more robust and NPPF compliant Green Belt boundary would be to follow the A4147 to where it crosses the M1. Taking all this land out of the Green Belt does not imply that all this land will be developed. It is also considered that land south of Leverstock Green between the A4147 and Bedmond Road needs to be excluded from the Green Belt if the desired housing capacity is to be achieved. TCE is willing to share its capacity calculations with SADC+
 - S6(iv) Whilst TCE has no specific boundary proposal in this area, it is felt that a Green Belt boundary which follows the overhead power lines is not NPPF compliant. Traditional field boundaries would be more appropriate.

There are also two non-Green Belt comments on the Proposals Map:

- In area S6(i) the Secondary School notation extends too far south
- The area shown for M1 J8 improvements needs to be larger to include associated works (ie. drainage).



PLANNING PERFORMANCE AGREEMENT

IN RELATION TO A PLANNING APPLICATION AT LAND EAST OF HEMEL HEMPSTEAD

- 1. This Planning Performance Agreement (PPA) is made on the 7th day of August 2019 between
 - a) St Albans City and District Council (SADC)
 - b) Dacorum Borough Council (DBC)
 - c) Hertfordshire County Council (HCC)

And the 'Developer'

- d)The Crown Estate (TCE).
- 2. In this PPA, the planning application at Land East of Hemel Hempstead is referred to as "the Development."
- 3. SADC and DBC are the local planning authorities for development within the area, set out in Schedule 1, in which the Development, set out in Schedule 2, is located. HCC is a statutory consultee. HCC has prepared the Local Transport Plan and is the highway authority for the Hertfordshire Area and statutory consultee with responsibility for delivery of a range of services.
- 4. This PPA is made pursuant to Section 111 of the Local Government Act 1972, Section 2 of the Local Government Act 2000 and Section 93 of the Local Government Act 2003.
- 5. 'Land East of Hemel Hempstead' Planning Application

Recitals

- 5.1. The Developer intends to submit a cross boundary Outline Planning Application (the "Planning Application") for the Development to SADC and DBC. The same application and supporting documents will be submitted to SADC and to DBC.
- 5.2. The Developer has entered into pre-application discussions with SADC and DBC regarding the Development. The Developer has also entered into pre-application discussions with HCC regarding the Development.

- **5.3.** The Planning Application will be in outline with some matters reserved for future consideration through reserved matters applications (see Application Description at Schedule 2).
- **5.4.** The Planning Application will be accompanied by such of the Application Documents (specified in Schedule 3) as are reasonably required by the local planning authorities.
- 5.5. The parties wish to ensure that the pre-application discussions and the Planning Application are considered in a timely manner and as expeditiously as is practicable, having regard to the overall timetable set out in this PPA and compliance with relevant statutory procedures.
- **5.6.** As part of the process of considering and determining the planning application, SADC and DBC will share relevant information with the Hertfordshire Local Enterprise Partnership (LEP) and seek their comments where appropriate, albeit the LEP is not a signatory to the PPA.
- **5.7.** SADC and DBC are to work jointly under this PPA during the pre-application negotiations, notwithstanding that the majority of the development site sits outside DBC's administrative area.
- **5.8.** This PPA seeks to agree broad requirements, timescales and a charging schedule for:
 - a) The pre-application process (including Masterplanning of the Development) for SADC, DBC AND HCC;
 - b) The post planning application submission process (with charging for DBC and HCC only);
- **5.9.** The consideration and determination of the Planning Application for the purposes of providing the parties with a level of certainty as to the process and timescale to be followed. In this PPA, the parties agree to extend the statutory determination period for the Planning Application.
- **5.10.** Given the scale and complexity of the project it is acknowledged that requirements, and the project programme, will evolve over time.
- 5.11. This PPA will not fetter SADC or DBC in exercising their statutory duties as local planning authority. It will not prejudice the outcome of the Planning Application or the impartiality of DBC, SADC or HCC in its role as a statutory and advisory consultee.
- **5.12.** This PPA shall not restrict or inhibit the Developer from exercising its right of appeal under Section 78 of the Town and Country Planning Act 1990.

- 5.13. The Developer, SADC, DBC and HCC have agreed to enter into this PPA to cover the pre-application / masterplanning of the Development, and outline planning application stages and for DBC and HCC to the assessment and processing of outline application up to the determination of the related application.
- **5.14.** This PPA will ensure that determination of the application is in accordance with a timeframe as agreed and acknowledged by all parties in advance, and would remove the application from the normal statutory target for determination.
- **5.15.** The Developer shall not seek to reclaim the statutory planning application fees paid to SADC and DBC in the event that the planning application is not determined within a period of 26 weeks from the date of registration of the application.
- **5.16.** Reasonable endeavours will be used to ensure that the parties meet an agreed programme for the pre-application and application processes. The key target project milestones are:
 - PPA Workshops August 2019 February 2020
 - Public Consultation on Masterplan November 2019
 - DRP December 2019
 - Masterplan layout to SADC PPC December 2019 / January 2020
 - Masterplan layout to SADC Cabinet January / February 2020
 - Earliest Agreed Submission Date Mid March 2020
- 5.17. The programme for PPA Workshops will be reviewed quarterly and held outside of this PPA agreement. These will include topic based workshops and s106/infrastructure workshops.
- 5.18. In the event that the Developer is dissatisfied with any part of the service provided by SADC and DBC, the Developer shall in the first instance raise the concerns in writing to: SADC's Development Management Manager and/or DBC's Assistant Director (Planning, Development & Regeneration) who shall seek to resolve the issues. If the issues cannot be resolved, then the Developer shall use the Council's internal complaints process.
- **5.19.** It is acknowledged that outside this PPA the Developer will need to consult with and seek authority from their Boards, committees and other decision makers pursuant to their schemes of delegation.

Terms and Objectives, including Timescales

5.20. This PPA will apply from 1st December 2018 and shall remain in force until the determination of the outline planning application unless terminated earlier.

- **5.21.** The Parties agree to extend the statutory determination period for issuing the planning decision notices and signing the S106 as follows:
 - Application submitted following pre-application process in accordance with a programme of pre-application meetings to be agreed, and reviewed as necessary (see Appendix 2);
 - Reporting of the application to planning committees at SADC and DBC within 26 weeks of the validation of the application (unless extension agreed as per Clause 5.15), unless an extension to this is agreed in advance between the parties;
 - Signing of the associated s106 Agreement (with phasing strategy and subject to all parties approving the same) if a full first draft is made available to all parties before or during the validation, and issuing of the decision notices within 12 weeks of the latter of the two committee resolutions arising from the meeting referred to above", unless an extension is agreed between the parties
- **5.22.** A separate undertaking of legal costs in relation to the s106 Agreement will be required in advance, for each Authority. This is separate to the fee associated with this PPA.
- **5.23.** The main topics for consideration in this PPA are set out in Appendix 1 of this PPA. It is not necessarily an exhaustive list and may be revised as discussions progress.
- **5.24.** The parties agree to use reasonable endeavours to hold a series of workshops in order to, as far as reasonably possible, resolve issues prior to the submission of an application. The programme, structure, scope and content of these workshops will be set out in a programme to be agreed between the parties and subject to regular review.
- **5.25.** The parties agree that a further Design Review Panel process shall be undertaken prior to the submission of the application, this being additional to the 3 PPA workshops and Design Panel Review held in February 2019.
- **5.26.** The Council would suggest that the following external consultees are key to be engaged with the proposals at pre-application stage;
 - Hertfordshire Local Enterprise Partnership
 - Highways England
 - Environment Agency
 - Historic Environment Unit (Archaeology)/ SADC's District Archaeologist

- Natural England
- Thames Water
- Health and Safety Executive
- Local residential and business community and key interest and user groups
- NHS
- Hertfordshire and Middlesex Wildlife Trust
- British Pipeline Association (BPA)
- NATS (regarding flightpaths)
- UKPN
- Hertfordshire County Council
 - Growth and Infrastructure Unit
 - Highways
 - Ecology
 - Countryside Access and Rights of Way
 - Lead Local Flood Authority
 - Education
 - Waste
 - o Fire and Rescue
 - o Adult Care Services
 - o Public Health
 - Early years
 - o Youth
 - Libraries

Amendment and Review

5.27. The PPA shall be subject to review as may be agreed between the Developer, SADC, DBC and HCC and any agreed variation of its terms shall be evidenced in writing, signed by all parties. This can be via email with a standard short form which would be read alongside this PPA. An example of the extension form is included at Schedule 7.

Breach and Termination

- **5.28.** Provided always that any breach is within the control of the party that is in breach, if any party considers that:
- a) the circumstances that brought about this PPA no longer apply;
- b) the principles and intentions of this PPA are not being followed; or
- c) there is a material failure by the other party to comply with the terms of this PPA;

it will draw their concerns to the attention of the other parties. The other parties will then have a period of not less than 10 working days within which to comment on and/or address the concerns. If the concerns are not addressed, the first party may then terminate this PPA at any point following the expiry of that period.

- **5.29.** The PPA will also be terminated where:
- a) the Developer submits an appeal under Section 78 of the Town and Country Planning Act 1990 in relation to the Planning Application (for whatever reason);
- b) the Planning Application is called in for determination by the Secretary of State under S77.
- **5.30.** The Developer reserves the right to terminate this PPA agreement at any time subject to the payment of any outstanding fees for work undertaken by the Parties and any agreed work undertaken third parties up to the date of termination.
- **5.31.** Any other signatory reserves the right to terminate this PPA at any time.

Joint Working

5.32. All Parties shall act with fairness and good faith in respect of all matters related to the pre-application process and the handling of the Planning Application and will work jointly in complying with their respective obligations under this PPA. The Developer, HCC, SADC and DBC will establish a Project Team which will be responsible for progressing the pre-application and Planning Application. The Project Team will include individuals identified in Schedule 6 who will work together as much as possible cooperatively in accordance with the obligations below and performance standards set out in Schedules 4 and 5.

Developer's Obligations

- **5.33.** The Developer agrees to use its reasonable endeavours to:
 - a) submit the Planning Application to SADC and DBC for the Development (set out in Schedule 2);
 - b) submit such of the Application Documents (set out in Schedule 3) as are required by the local planning authority, in the format requested with the Planning Application when they are submitted;
 - c) comply with the Performance Standards (set out in Schedule 4);
 - d) designate the Developer's Project Team lead person and other team members as identified in Schedule 6. The designated lead person and others as required will attend all pre-application and Project Team meetings.

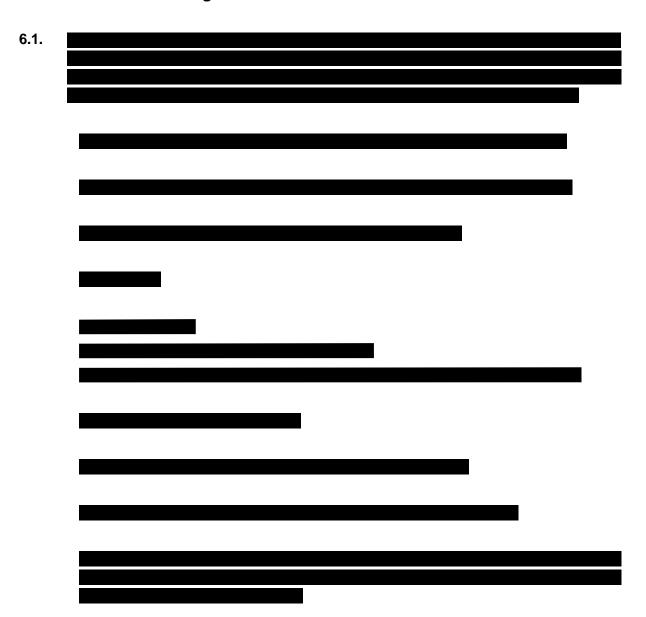
HCC, SADC's and DBC's Obligations

5.34. Without prejudice to their other obligations as the local planning authorities, SADC and DBC and HCC as a statutory and advisory consultee and statutory

provider of services, agree to work cooperatively in progressing the preapplication and Planning Application and complying with its obligations under this PPA and to use its reasonable endeavours to:

- a) each designate a Project Team lead officer and other officers as identified in Schedule 6. The designated lead officer and others as required will attend all pre-application and Project Team meetings and shall be responsible for overseeing and carrying out the functions in accordance with this PPA;
- b) comply with the Performance Standards (set out in Schedule 5); and

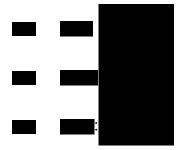
6.	Fees	and	Charges
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6.2. The fees outlined above relate to work to be undertaken only in respect of the Development at East Hemel Hempstead and do not include any work to be undertaken in respect of Hemel Garden Town. It is acknowledged, however,

that there are important interrelationships, and that LEHH staff will need an awareness of HGT work streams and their interlinkages with "Phase 1", in order to be able to progress the LEHH project.

- 6.3. Subject to 6.4, the monthly retainer and HCC's charges are payable from the 1st December 2018 until such time as the planning application is submitted or determined dependent on the relevant PPA party. Separate invoices will be raised by each authority, and the Developer agrees to pay monthly.
- **6.4.** For the period 1st December 2018 until 31st July 2019, the fees payable are:



- **6.8.** From 1st December 2018, the Developer has engaged in pre-application discussions with SADC, DBC and HCC including PPA Workshops held on 4th 6th February 2019 and formal Design Panel Review led by Design South East on 19th February 2019.
- **6.9.** This PPA relates to the outline planning application only. An additional fee may be required for resourcing of reserved matters applications, discharge of condition applications and post commencement monitoring.
- **6.10.** In addition to the monthly fees, it will be necessary for the Authorities to procure external services, which may be pre or post application (or both) and will include but may not necessarily be limited to:
 - 6.10.1.Landscape Consultant;
 - 6.10.2. Sustainability Consultant;
 - 6.10.3. Viability Consultant;
 - 6.10.4.Legal Consultant to support S106 including covering the legal costs of supervisory legal time to procure legal support from each of the authorities that are signatories to the agreement,.
- **6.11.** Procurement of external services will be carried out by SADC as lead authority, except where it is necessary to have separate procurements (such as in the case of legal procurement where each authority will need representation).

A brief for the procurement of all external services will be discussed and agreed by all of the authorities in advance with the Developer, including a cap on fees.

6.12. The Developer agrees to pay the cost of procuring the external services in full, a schedule for such payment is to be agreed and appended to this PPA at the appropriate time. Payment of any external services will be at pre-agreed stages, agreed at procurement stage.

The justification for the monthly retainers and hourly rate approach for HCC outlined above (as opposed to a fixed amount) is in relation to the complexities and uncertainties of the project and the uncertainties around the detail of the pre-application programme.

6.13. Prior to submission of the planning application subject of this PPA, SADC and DBC will carry out a pre-submission validation review at a charge of £500 plus VAT payable in advance to each authority.

7. Confidentiality

7.1.1. All parties are governed by the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 in how they handle the information that they hold.

8. Legal Effect

8.1.1. For the avoidance of doubt this PPA is not intended to be legally binding.

SIGNATURES

Signed by the parties or their duly authorised representatives:

The Crown Estate

Signed:



Title & Full Name: John Grinnell, Deputy Head of Development & Project Management

Date: 8th August 2019

St Albans City & District Council

Signed by:



Title & Full Name: Tracy Harvey, Head of Planning and Building Control

Date: 6th August 2019

Dacorum Borough Council

Signed by:



Title & Full Name...James Doe, Assistant Director – Planning, Development and Regeneratiion

Date:...07 August 2019...

Hertfordshire County Council

Title & Full Name Sarah McLaughlin, Head of the Growth and Infrastructure Unit. Date: 06 August 2019.....

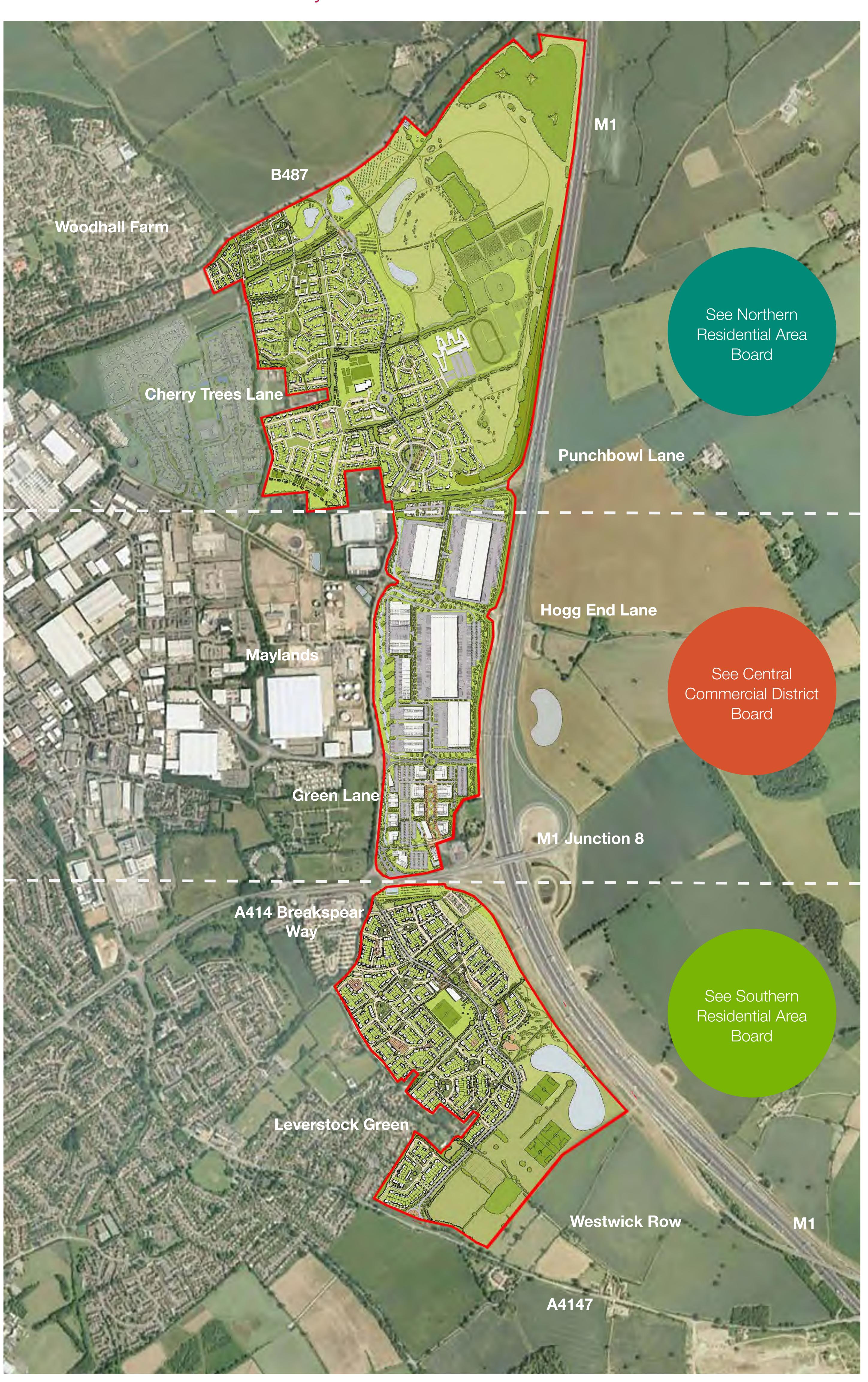
East Hemel



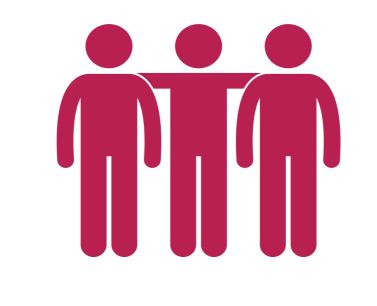
Proposed masterplan

We have developed a masterplan that reflects feedback from the previous public consultation. It also addresses feedback from SADC and other key consultees such as the Highways Authority.

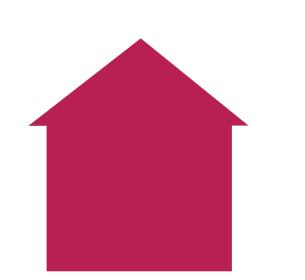
Our proposed development area is larger than the site allocated in SADC's SLP. This is because our own technical work and the site's constraints have shown that it would not be possible to deliver the required 2,500 homes — while also delivering a scheme which reflects the character and density of the surrounding area — in the area allocated by SADC.



Our masterplan will deliver



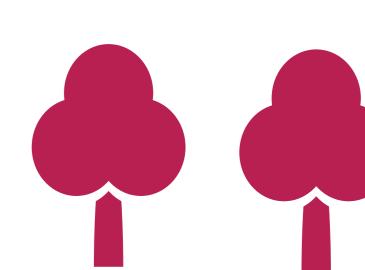
Three distinct areas delivered as one scheme



2,500 new homes, 1,000 of which will be affordable



55 hectares of new, flexible employment space



A landscape-focused approach that seeks to retain existing hedgerows, trees and





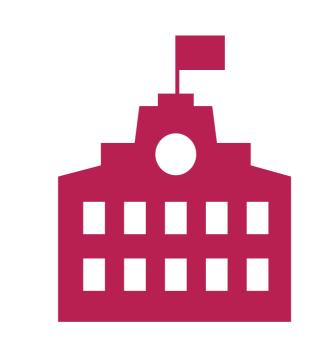


Sensitivity to the different **characters** of Woodhall Farm and Leverstock Green

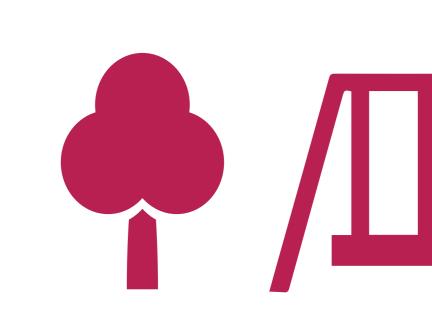


field boundaries

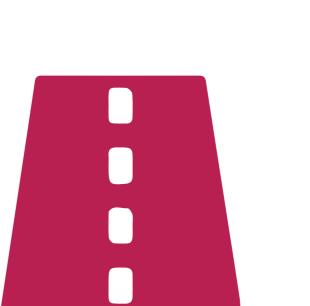
New primary and secondary schools



'Local centres' within each of the three areas



Two new country parks that are easily accessible

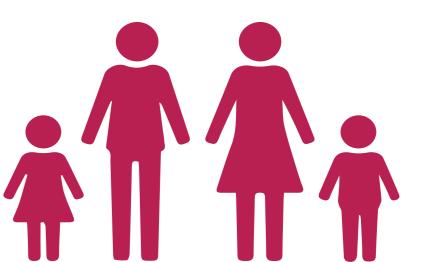


Improved highways

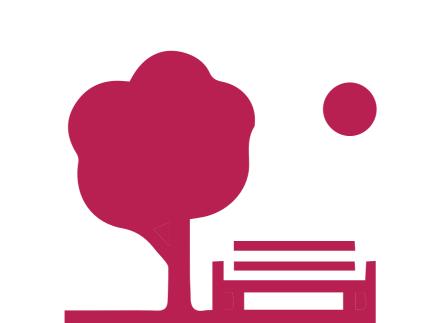
and bus services, so the wider community can benefit from development at East

Hemel

parks



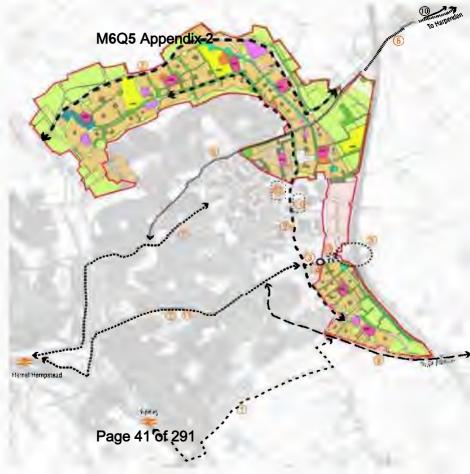
Pre-school and after school care either as part of the new schools or provided separately



A necklace of green spaces that connect each area together, enabling the wider community to walk or cycle through the development and access the country



Two travellers sites as required by the local authority



St Albans Local Plan - Statement of Common Ground between St Albans City & District Council (SADC) and the Crown Estate (TCE) - East Hemel Hempstead (South) Broad Location (S6 iii)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC) and the Crown Estate (TCE) in relation to the Local Plan Broad Location S6 (iii) – East Hemel Hempstead (South). It concisely considers areas of agreement between the parties following the TCE's representations on the St Albans Draft Local Plan in order to confirm the soundness and robustness of the Broad Location. It is anticipated that further agreed detail may be available by the time of the commencement of the Local Plan Hearing session on 21 January 2020.

The agreed matters in this SOCG do not preclude any further written or verbal representations that the District Council and TCE may wish to make as part of the Local Plan Examination.

TCE is working collaboratively, cooperatively, proactively and productively with SADC and all relevant partners to bring the site forward for development as set out in Policy S6 (iii).

It is important to also consider alongside this document the signed Local Plan Developer / Site Promoter Response Proforma 2018 as set out at appendix 1.

2. Legal Compliance; Duty to Co-operate and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

The parties consider that the Local Plan is legally compliant and consistent with the principles of the National Planning Policy Framework (2019). It is considered that St Albans City & District Council has fulfilled the Duty to Co-operate and that the Local Plan has been prepared in accordance with the timetable set out in the Local Development Scheme. Furthermore, it is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement and appropriate bodies have been consulted. A comprehensive and robust Sustainability Appraisal has also been carried out to support the Local Plan.

3. The Site

The site S6 iii) is shown on the Draft Local Plan Policies Map (CD003) and a map of the directly relevant area controlled/owned by TCE is given in Appendix 2.

4. Broad Location for Development

The parties for the site agree that Policy S6 (iii) is sound and robust in principle and evidence shows that all requirements can and will be delivered at the point in time currently envisaged in the Plan:

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 iii) - East Hemel Hempstead (South) Broad Location

Objective

To provide a major urban extension of Hemel Hempstead. (Delivery of approximately 200 dwellings continuing beyond 2036)

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with Dacorum Borough Council, local communities, landowners and other stakeholders
- 2 Minimum capacity 2,400 dwellings
- The 2,400 dwelling figure above includes at least one 50+ bed C2 Residential or Nursing care home, at least one 50+ home C3 Flexi-care scheme and 12 units to provide special needs accommodation, in accordance with Policy L2
- 4 A positive relationship with Leverstock Green and the wider existing neighbourhood structure of Hemel Hempstead
- 5 Minimum 40% Affordable Housing in accordance with Policy L3
- 6 Minimum overall net density 40 dwellings per hectare
- 7 Housing size, type and mix as set out in Policy L1 and Appendix 6
- 8 Strategic and local public open space, including managed woodland and ecological network links
- 9 Countryside access links including improved off-road paths (rights of way) and links to a community food zone retained in the Green Belt
- 10 A substantial new Country Park providing facilities for new and existing communities and a permanent green buffer to the south east
- 11 Retention of important trees and landscape features
- 12 One new 3FE and one new 2FE primary schools, including Early Years provision, to serve the new community
- 13 Transport network (including walking and cycling links) and public transport services upgrades/improvements
- 14 3% of homes provided to be self-build housing
- 15 New neighbourhood and local centres, including commercial development opportunities; which provide support for, rather than competition with, existing Leverstock Green facilities.
- 16 Recreation space and other community facilities, including health provision
- 17 Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands
- 18 One 15 pitch Gypsy and Traveller site
- 19 Excellence in design, energy efficiency and water management
- 20 Appropriate renewable energy production and supply mechanisms
- 21 Design to mitigate adverse impacts from motorway noise and air pollution.

5. Outstanding Matters

The following limited outstanding matters remains between the parties, in regard to Policy S6 (iii):

- S6 (i) 14 3% of homes provided to be self-build housing TCE view as per Reg 19 rep 51946 page 208 - No justification for 3% self-build figure
- 2. The Green Belt boundary TCE view as per Reg 19 rep 51946 page 207 Built development boundary should be amended to be in line with SLR plan L2

6. Masterplanning and Delivery

The parties confirm their willingness to progress a timely planning application in order to meet (or come forward sooner than) the programme of completions in the plan housing trajectory. The Parties have agreed a Planning Performance Agreement (PPA) as set out in Appendix 3. Since the start of the PPA process in 2018, SADC, DBC and HCC have worked towards submitting a planning application for the

whole of S6(i) and (ii) and the northern part of S6(iii) in the Spring of 2020, with the application being considered by Members later in 2020. The PPA process is assisting in bringing forward the Broad Location in accordance with S6(iii). Whilst still undergoing significant further iteration generally through the process set out in the Strategic and Sites Masterplanning Toolkit, including responding to public engagement, an indicative Masterplan can be seen at Appendix 4.

7. Appendices

- 1. Local Plan Developer / Site Promoter Response Proforma
- 2. A plan of the directly relevant area controlled/owned by TCE
- 3. Agreed PPA
- 4. Indicative Masterplan



On behalf of the Crown Estate

Dated: N (12 19)



9.12.19

Chris Briggs
Spatial Planning Manager
St Albans City and District Council

Proforma Responses by Landowner/Developer

Broad Location(s):	Sites S6(i), (ii), (iii) and (iv)
Developer / Promoter:	The Crown Estate

1. The draft Broad Location is 'available' There are no issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc.	Yes	Any Commentary: The Crown Estate is actively promoting the locations for development and confirm that they are available with no known constraints prohibiting the delivery of the allocations proposed. The Crown Estate owns the freehold of sites S6(i), (ii) and (iii). It is in active discussions with the owners of S6(iv) who are supportive of the sites inclusion within the emerging Local Plan.
2. The draft Broad Location is 'Deliverable / Achievable' There is a reasonable prospect that the development, including all key aspects being assessed as part of the overall 'package' proposed, is viable and deliverable	Yes	Any Commentary: The sites are deliverable: Significant promotion and consultation work has bene completed over the last 4 years and it is the intention of the Crown Estate to submit an outline application for early phases to support the Local Plan process. The land for 3 of the 4 locations is in the ownership of the Crown Estate who promote land across the country for residential and employment development.

The proposed schemes are viable and can deliver the components of the allocation specific policies as currently drafted.

The sites can contribute towards key infrastructure such as improvements to Breakspear Roundabout and Junction 8 (as set out in the Maylands Growth Corridor Study), but TCE anticipate that other sources of funding and scheme contributions will be made available for these sub regionally important items.

3. The relevant draft Local Plan Policy requirements are acceptable and achievable

This includes specifically Policies L1 Housing Size, Type, Mix and Density; L2 Provision of Older Persons Housing and Special Needs Housing; and L3 - Provision of and Financial Contributions towards Affordable Housing (including specified mix of 'social rent', 'affordable rent' and 'subsidised home ownership') This also includes the matrix in Appendix 1 for Housing Mix / Tenure

Yes

Any Commentary:
The proposed schemes can deliver 40% affordable housing subject to viability and the delicate balance between delivering infrastructure and housing concurrently.

TCE broadly supports the suggested mix of 30% social rent, 30% affordable rent and 40% subsidised home ownership.

TCE intends to select a Registered Provider during each phase of the scheme to ensure that the quality, delivery and management of affordable homes remains high.

The exact mix of units for each tenure type will need detailed assessment through the Strategic Housing Market Assessment which will need to be updated regularly throughout the Local Plan period and the lifetime of the schemes. Any planning

	application will reflect the needs assessment relevant at that time.
4. The relevant draft Broad Location policy requirements (S6 – individual Broad Location as applicable) are acceptable and achievable.	Any Commentary: See below – Question 4 commentary
5. The relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) are acceptable and achievable	Any Commentary: See below – Question 5 commentary
6. The 'deliverable / achievable' community benefits (of all relevant kinds) to help the Council in consideration of 'exceptional circumstances', including any 'additionality' or 'beyond standard' elements, are considered to be (listed in brief, no specific limit on number):	1 Provision of a Secondary School 2 Package of Nickey Line enhancements (includes Redbourn) 3 Country Park 4 Multi modal interchange 5 Making provision for a wider Hemel Hempstead link road from Leighton Buzzard Road to M1 J8.
7. Any other important considerations which the Council should be aware of	None

Question 4 commentary. : S6 Requirements

The Broad Location requirements for sites S6(i), (ii) (iii) and (iv) are acceptable in principle. However, The Crown Estate (TCE) reserves the right to submit representations on the following points:

- Masterplanning TCE has already held public consultation events that have led to the masterplan evolving. Details can be found at http://easthemel.co.uk/. Significant consultation has also occurred with many statutory stakeholders to ensure that the masterplan reflects the needs of others and is deliverable. TCE are now holding regular pre-application meetings with SACDC officers, including the in-house masterplanner, to finalise the masterplan.
- Affordable Housing As stated above, the tenure split outlined in policy L3 is broadly acceptable to TCE albeit that the exact mix of unit types need to be determined via an up to date and robust Strategic Housing Market Assessment (SHMA) and at each application stage.
- 3. Self build plots TCE encourages flexible delivery of homes and is happy to provide a limited number of self-build plots subject to demand and needs based evidence as well as S106 details regarding delivery and take up.

Furthermore, TCE reserves the right to submit representations on the following details in respect of the Central Employment Zone (S6(ii))

S6(ii) (4 and 5) The land area split between B1 and B2 / B8 uses is too inflexible to accommodate employment change over the next 18 years

 S6(ii) (ii) TCE support the use of exceptional environmental opportunities but CHP should be used as an example and not a requirement since technology will evolve and CHP may not be the most appropriate technology.

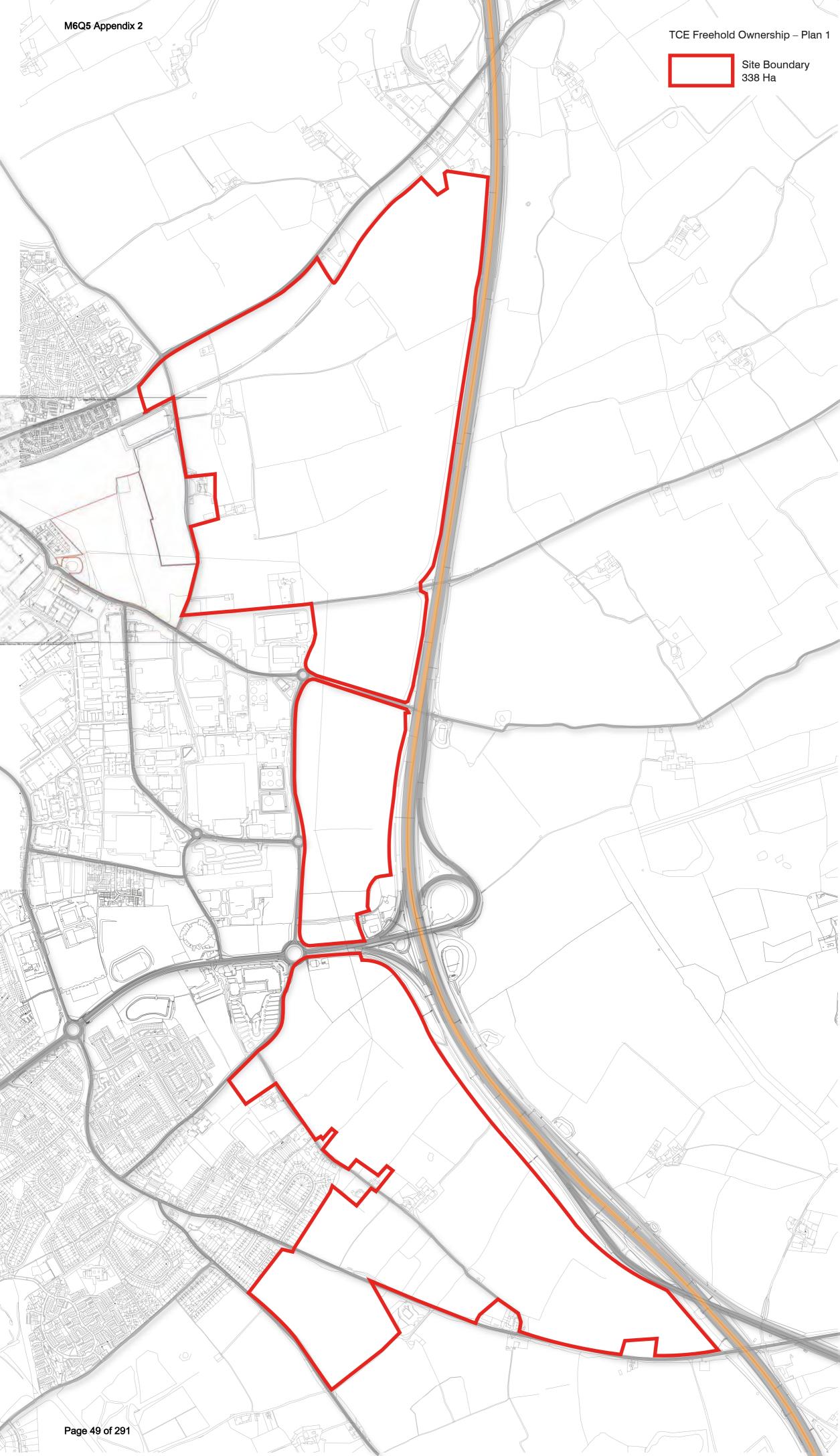
Question 5 commentary. : Policy Map Requirements

TCE accepts the broad conclusions of the SKM report but consider that the definition of detailed Green Belt boundaries does not reflect the guidance in the NPPF or the detailed master planning work that has been discussed with SADC. The detailed changes proposed by TCE are:

- S6(i) Rather than following the line of the overhead power lines, the Green Belt boundary should follow the built edge of the master plan development edge. This would show the Secondary School buildings and the inverted triangle of housing south of the Secondary School as excluded from the Green Belt
- S6(iii) A more robust and NPPF compliant Green Belt boundary would be to follow the A4147 to where it crosses the M1. Taking all this land out of the Green Belt does not imply that all this land will be developed. It is also considered that land south of Leverstock Green between the A4147 and Bedmond Road needs to be excluded from the Green Belt if the desired housing capacity is to be achieved. TCE is willing to share its capacity calculations with SADC+
 - S6(iv) Whilst TCE has no specific boundary proposal in this area, it is felt that a Green Belt boundary which follows the overhead power lines is not NPPF compliant. Traditional field boundaries would be more appropriate.

There are also two non-Green Belt comments on the Proposals Map:

- In area S6(i) the Secondary School notation extends too far south
- The area shown for M1 J8 improvements needs to be larger to include associated works (ie. drainage).



PLANNING PERFORMANCE AGREEMENT

IN RELATION TO A PLANNING APPLICATION AT LAND EAST OF HEMEL HEMPSTEAD

- 1. This Planning Performance Agreement (PPA) is made on the 7th day of August 2019 between
 - a) St Albans City and District Council (SADC)
 - b) Dacorum Borough Council (DBC)
 - c) Hertfordshire County Council (HCC)

And the 'Developer'

- d)The Crown Estate (TCE).
- 2. In this PPA, the planning application at Land East of Hemel Hempstead is referred to as "the Development."
- 3. SADC and DBC are the local planning authorities for development within the area, set out in Schedule 1, in which the Development, set out in Schedule 2, is located. HCC is a statutory consultee. HCC has prepared the Local Transport Plan and is the highway authority for the Hertfordshire Area and statutory consultee with responsibility for delivery of a range of services.
- 4. This PPA is made pursuant to Section 111 of the Local Government Act 1972, Section 2 of the Local Government Act 2000 and Section 93 of the Local Government Act 2003.
- 5. 'Land East of Hemel Hempstead' Planning Application

Recitals

- 5.1. The Developer intends to submit a cross boundary Outline Planning Application (the "Planning Application") for the Development to SADC and DBC. The same application and supporting documents will be submitted to SADC and to DBC.
- 5.2. The Developer has entered into pre-application discussions with SADC and DBC regarding the Development. The Developer has also entered into pre-application discussions with HCC regarding the Development.

- **5.3.** The Planning Application will be in outline with some matters reserved for future consideration through reserved matters applications (see Application Description at Schedule 2).
- **5.4.** The Planning Application will be accompanied by such of the Application Documents (specified in Schedule 3) as are reasonably required by the local planning authorities.
- 5.5. The parties wish to ensure that the pre-application discussions and the Planning Application are considered in a timely manner and as expeditiously as is practicable, having regard to the overall timetable set out in this PPA and compliance with relevant statutory procedures.
- **5.6.** As part of the process of considering and determining the planning application, SADC and DBC will share relevant information with the Hertfordshire Local Enterprise Partnership (LEP) and seek their comments where appropriate, albeit the LEP is not a signatory to the PPA.
- **5.7.** SADC and DBC are to work jointly under this PPA during the pre-application negotiations, notwithstanding that the majority of the development site sits outside DBC's administrative area.
- **5.8.** This PPA seeks to agree broad requirements, timescales and a charging schedule for:
 - a) The pre-application process (including Masterplanning of the Development) for SADC, DBC AND HCC;
 - b) The post planning application submission process (with charging for DBC and HCC only);
- **5.9.** The consideration and determination of the Planning Application for the purposes of providing the parties with a level of certainty as to the process and timescale to be followed. In this PPA, the parties agree to extend the statutory determination period for the Planning Application.
- **5.10.** Given the scale and complexity of the project it is acknowledged that requirements, and the project programme, will evolve over time.
- **5.11.** This PPA will not fetter SADC or DBC in exercising their statutory duties as local planning authority. It will not prejudice the outcome of the Planning Application or the impartiality of DBC, SADC or HCC in its role as a statutory and advisory consultee.
- **5.12.** This PPA shall not restrict or inhibit the Developer from exercising its right of appeal under Section 78 of the Town and Country Planning Act 1990.

- 5.13. The Developer, SADC, DBC and HCC have agreed to enter into this PPA to cover the pre-application / masterplanning of the Development, and outline planning application stages and for DBC and HCC to the assessment and processing of outline application up to the determination of the related application.
- **5.14.** This PPA will ensure that determination of the application is in accordance with a timeframe as agreed and acknowledged by all parties in advance, and would remove the application from the normal statutory target for determination.
- **5.15.** The Developer shall not seek to reclaim the statutory planning application fees paid to SADC and DBC in the event that the planning application is not determined within a period of 26 weeks from the date of registration of the application.
- **5.16.** Reasonable endeavours will be used to ensure that the parties meet an agreed programme for the pre-application and application processes. The key target project milestones are:
 - PPA Workshops August 2019 February 2020
 - Public Consultation on Masterplan November 2019
 - DRP December 2019
 - Masterplan layout to SADC PPC December 2019 / January 2020
 - Masterplan layout to SADC Cabinet January / February 2020
 - Earliest Agreed Submission Date Mid March 2020
- **5.17.** The programme for PPA Workshops will be reviewed quarterly and held outside of this PPA agreement. These will include topic based workshops and s106/infrastructure workshops.
- 5.18. In the event that the Developer is dissatisfied with any part of the service provided by SADC and DBC, the Developer shall in the first instance raise the concerns in writing to: SADC's Development Management Manager and/or DBC's Assistant Director (Planning, Development & Regeneration) who shall seek to resolve the issues. If the issues cannot be resolved, then the Developer shall use the Council's internal complaints process.
- **5.19.** It is acknowledged that outside this PPA the Developer will need to consult with and seek authority from their Boards, committees and other decision makers pursuant to their schemes of delegation.

Terms and Objectives, including Timescales

5.20. This PPA will apply from 1st December 2018 and shall remain in force until the determination of the outline planning application unless terminated earlier.

- **5.21.** The Parties agree to extend the statutory determination period for issuing the planning decision notices and signing the S106 as follows:
 - Application submitted following pre-application process in accordance with a programme of pre-application meetings to be agreed, and reviewed as necessary (see Appendix 2);
 - Reporting of the application to planning committees at SADC and DBC within 26 weeks of the validation of the application (unless extension agreed as per Clause 5.15), unless an extension to this is agreed in advance between the parties;
 - Signing of the associated s106 Agreement (with phasing strategy and subject to all parties approving the same) if a full first draft is made available to all parties before or during the validation, and issuing of the decision notices within 12 weeks of the latter of the two committee resolutions arising from the meeting referred to above", unless an extension is agreed between the parties
- **5.22.** A separate undertaking of legal costs in relation to the s106 Agreement will be required in advance, for each Authority. This is separate to the fee associated with this PPA.
- **5.23.** The main topics for consideration in this PPA are set out in Appendix 1 of this PPA. It is not necessarily an exhaustive list and may be revised as discussions progress.
- **5.24.** The parties agree to use reasonable endeavours to hold a series of workshops in order to, as far as reasonably possible, resolve issues prior to the submission of an application. The programme, structure, scope and content of these workshops will be set out in a programme to be agreed between the parties and subject to regular review.
- **5.25.** The parties agree that a further Design Review Panel process shall be undertaken prior to the submission of the application, this being additional to the 3 PPA workshops and Design Panel Review held in February 2019.
- **5.26.** The Council would suggest that the following external consultees are key to be engaged with the proposals at pre-application stage;
 - Hertfordshire Local Enterprise Partnership
 - Highways England
 - Environment Agency
 - Historic Environment Unit (Archaeology)/ SADC's District Archaeologist

- Natural England
- Thames Water
- Health and Safety Executive
- Local residential and business community and key interest and user groups
- NHS
- Hertfordshire and Middlesex Wildlife Trust
- British Pipeline Association (BPA)
- NATS (regarding flightpaths)
- UKPN
- Hertfordshire County Council
 - Growth and Infrastructure Unit
 - Highways
 - Ecology
 - Countryside Access and Rights of Way
 - Lead Local Flood Authority
 - Education
 - Waste
 - o Fire and Rescue
 - Adult Care Services
 - o Public Health
 - Early years
 - o Youth
 - Libraries

Amendment and Review

5.27. The PPA shall be subject to review as may be agreed between the Developer, SADC, DBC and HCC and any agreed variation of its terms shall be evidenced in writing, signed by all parties. This can be via email with a standard short form which would be read alongside this PPA. An example of the extension form is included at Schedule 7.

Breach and Termination

- **5.28.** Provided always that any breach is within the control of the party that is in breach, if any party considers that:
- a) the circumstances that brought about this PPA no longer apply;
- b) the principles and intentions of this PPA are not being followed; or
- c) there is a material failure by the other party to comply with the terms of this PPA;

it will draw their concerns to the attention of the other parties. The other parties will then have a period of not less than 10 working days within which to comment on and/or address the concerns. If the concerns are not addressed, the first party may then terminate this PPA at any point following the expiry of that period.

- **5.29.** The PPA will also be terminated where:
- a) the Developer submits an appeal under Section 78 of the Town and Country Planning Act 1990 in relation to the Planning Application (for whatever reason);
- b) the Planning Application is called in for determination by the Secretary of State under S77.
- **5.30.** The Developer reserves the right to terminate this PPA agreement at any time subject to the payment of any outstanding fees for work undertaken by the Parties and any agreed work undertaken third parties up to the date of termination.
- **5.31.** Any other signatory reserves the right to terminate this PPA at any time.

Joint Working

5.32. All Parties shall act with fairness and good faith in respect of all matters related to the pre-application process and the handling of the Planning Application and will work jointly in complying with their respective obligations under this PPA. The Developer, HCC, SADC and DBC will establish a Project Team which will be responsible for progressing the pre-application and Planning Application. The Project Team will include individuals identified in Schedule 6 who will work together as much as possible cooperatively in accordance with the obligations below and performance standards set out in Schedules 4 and 5.

Developer's Obligations

- **5.33.** The Developer agrees to use its reasonable endeavours to:
 - a) submit the Planning Application to SADC and DBC for the Development (set out in Schedule 2);
 - b) submit such of the Application Documents (set out in Schedule 3) as are required by the local planning authority, in the format requested with the Planning Application when they are submitted;
 - c) comply with the Performance Standards (set out in Schedule 4);
 - d) designate the Developer's Project Team lead person and other team members as identified in Schedule 6. The designated lead person and others as required will attend all pre-application and Project Team meetings.

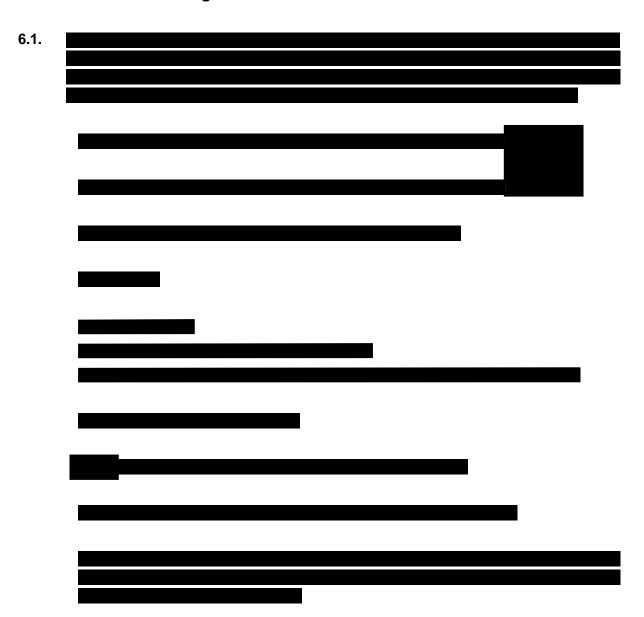
HCC, SADC's and DBC's Obligations

5.34. Without prejudice to their other obligations as the local planning authorities, SADC and DBC and HCC as a statutory and advisory consultee and statutory

provider of services, agree to work cooperatively in progressing the preapplication and Planning Application and complying with its obligations under this PPA and to use its reasonable endeavours to:

- a) each designate a Project Team lead officer and other officers as identified in Schedule 6. The designated lead officer and others as required will attend all pre-application and Project Team meetings and shall be responsible for overseeing and carrying out the functions in accordance with this PPA;
- b) comply with the Performance Standards (set out in Schedule 5); and

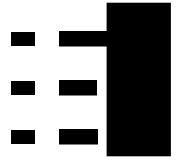
6. Fees and Charges



6.2. The fees outlined above relate to work to be undertaken only in respect of the Development at East Hemel Hempstead and do not include any work to be undertaken in respect of Hemel Garden Town. It is acknowledged, however,

that there are important interrelationships, and that LEHH staff will need an awareness of HGT work streams and their interlinkages with "Phase 1", in order to be able to progress the LEHH project.

- 6.3. Subject to 6.4, the monthly retainer and HCC's charges are payable from the 1st December 2018 until such time as the planning application is submitted or determined dependent on the relevant PPA party. Separate invoices will be raised by each authority, and the Developer agrees to pay monthly.
- **6.4.** For the period 1st December 2018 until 31st July 2019, the fees payable are:



- **6.8.** From 1st December 2018, the Developer has engaged in pre-application discussions with SADC, DBC and HCC including PPA Workshops held on 4th 6th February 2019 and formal Design Panel Review led by Design South East on 19th February 2019.
- **6.9.** This PPA relates to the outline planning application only. An additional fee may be required for resourcing of reserved matters applications, discharge of condition applications and post commencement monitoring.
- **6.10.** In addition to the monthly fees, it will be necessary for the Authorities to procure external services, which may be pre or post application (or both) and will include but may not necessarily be limited to:
 - 6.10.1.Landscape Consultant;
 - 6.10.2. Sustainability Consultant;
 - 6.10.3. Viability Consultant;
 - 6.10.4.Legal Consultant to support S106 including covering the legal costs of supervisory legal time to procure legal support from each of the authorities that are signatories to the agreement,.
- **6.11.** Procurement of external services will be carried out by SADC as lead authority, except where it is necessary to have separate procurements (such as in the case of legal procurement where each authority will need representation).

A brief for the procurement of all external services will be discussed and agreed by all of the authorities in advance with the Developer, including a cap on fees.

6.12. The Developer agrees to pay the cost of procuring the external services in full, a schedule for such payment is to be agreed and appended to this PPA at the appropriate time. Payment of any external services will be at pre-agreed stages, agreed at procurement stage.

The justification for the monthly retainers and hourly rate approach for HCC outlined above (as opposed to a fixed amount) is in relation to the complexities and uncertainties of the project and the uncertainties around the detail of the pre-application programme.

6.13. Prior to submission of the planning application subject of this PPA, SADC and DBC will carry out a pre-submission validation review at a charge of £500 plus VAT payable in advance to each authority.

7. Confidentiality

7.1.1. All parties are governed by the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 in how they handle the information that they hold.

8. Legal Effect

8.1.1. For the avoidance of doubt this PPA is not intended to be legally binding.

SIGNATURES

Signed by the parties or their duly authorised representatives:

The Crown Estate

Signed:



Title & Full Name: John Grinnell, Deputy Head of Development & Project Management

Date: 8th August 2019

St Albans City & District Council

Signed by:



Title & Full Name: Tracy Harvey, Head of Planning and Building Control

Date: 6th August 2019

Dacorum Borough Council

Signed by:



Title & Full Name...James Doe, Assistant Director – Planning, Development and Regeneratiion

Date:...07 August 2019...

Hertfordshire County Council	
Signed:	

Title & Full Name Sarah McLaughlin, Head of the Growth and Infrastructure Unit. Date: 06 August 2019.....

East Hemel



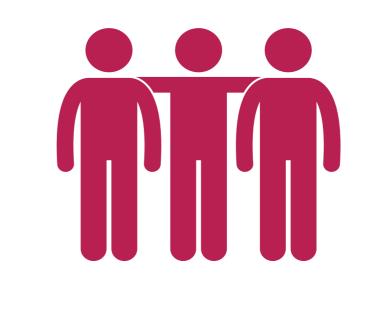
Proposed masterplan

We have developed a masterplan that reflects feedback from the previous public consultation. It also addresses feedback from SADC and other key consultees such as the Highways Authority.

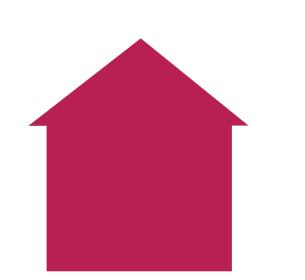
Our proposed development area is larger than the site allocated in SADC's SLP. This is because our own technical work and the site's constraints have shown that it would not be possible to deliver the required 2,500 homes — while also delivering a scheme which reflects the character and density of the surrounding area — in the area allocated by SADC.



Our masterplan will deliver



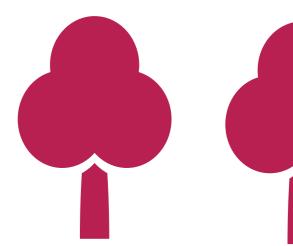
Three distinct areas delivered as one scheme



2,500 new homes, 1,000 of which will be affordable



55 hectares of new, flexible employment space



A landscape-focused

approach that seeks to retain existing hedgerows, trees and field boundaries



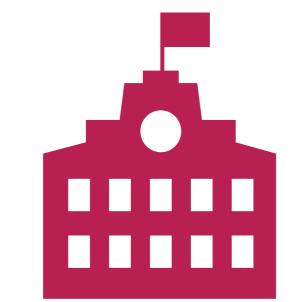




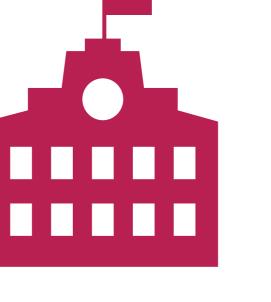
Sensitivity to the different **characters** of Woodhall Farm and Leverstock Green



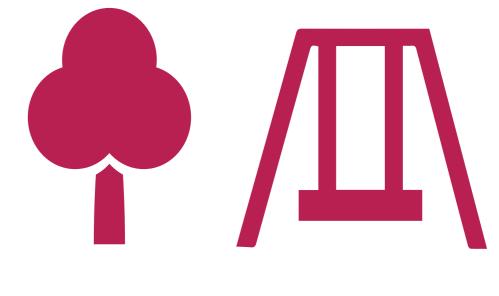
New primary and secondary schools



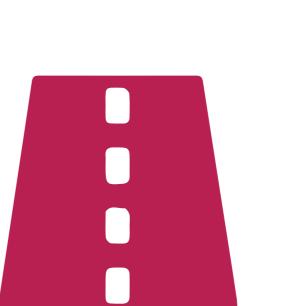
'Local centres' within



each of the three areas



Two new country parks that are easily accessible



Improved highways

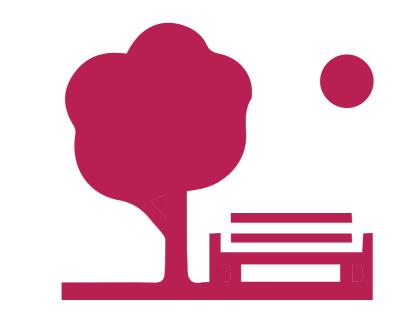
and bus services, so the wider community can benefit from development at East

Hemel

parks



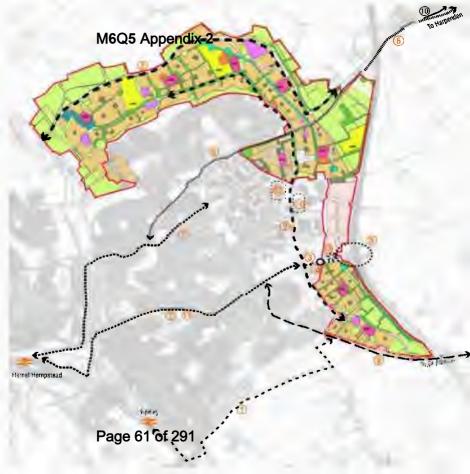
Pre-school and after school care either as part of the new schools or provided separately



A necklace of green spaces that connect each area together, enabling the wider community to walk or cycle through the development and access the country



Two travellers sites as required by the local authority



St Albans Local Plan - Statement of Common Ground between St Albans City & District Council (SADC), Pigeon Hemel Hempstead Ltd (PHH) and Bloor Homes Ltd (BHL) - North Hemel Hempstead Broad Location (S6 iv)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC), Pigeon Hemel Hempstead Ltd (PHH) and Bloor Homes Ltd (BHL) in relation to the Local Plan Broad Location S6 (iv) – North Hemel Hempstead. It concisely considers areas of agreement between the parties following PHH's and the previous landowners, Mr and Mrs Barr's, representations on the St Albans Draft Local Plan in order to confirm the soundness and robustness of the Broad Location. It is anticipated that further agreed detail may be available by the time of the commencement of the Local Plan Hearing sessions on 21 January 2020.

The agreed matters in this SOCG do not preclude any further written or verbal representations that the District Council and PHH may wish to make as part of the Local Plan Examination or any subsequent stages.

PHH is the owner of the southern part of the North Hemel Hempstead Broad Location Site and has been working with the other landowners and their development partners in leading the promotion and delivery of the site. BHL is at the stage of advanced negotiations with the landowners (Stanbridge) of the northern part of S6 iv and hope to conclude an agreement in early 2020. BHL have the owner's approval to sign on their behalf. PHH and BHL confirm that the Site is available for development and PHH and BHL are working collaboratively, cooperatively, proactively and productively with SADC, the other landowners and all relevant partners to bring the site forward for development in accordance with Policy S6 (iv).

It is important to also consider alongside this document the signed Local Plan Developer / Site Promoter Response Proforma 2018 as set out at Appendix 1. The document was prepared in advance of PHH's or BHL involvement in North Hemel Hempstead but the principles set out there are agreed.

2. Legal Compliance; Duty to Co-operate and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

In so far as these relate to (S6 iv) the parties consider that the Local Plan is legally compliant and consistent with national planning policy and guidance, including the National Planning Policy Framework (2019). It is considered that St Albans City & District Council has fulfilled the Duty to Cooperate and that the Local Plan has been prepared in accordance with the timetable set out in the Local Development Scheme. Furthermore, it is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement and appropriate bodies have been consulted. A comprehensive and robust Sustainability Appraisal has also been carried out to support the Local Plan. Through its response to the Matters raised by the Inspector, PHH's submissions will elaborate upon its support for the approach taken and the work undertaken by the Council in the preparation of the Local Plan.

PHH and BHL are appearing at the local plan examination to raise matters relating to delivery and the trajectory of the development of S6 iv but these are not material issues between PHH, Bloor or SADC – see further below.

3. The Site

The site S6 iv) is shown on the Draft Local Plan Policies Map (CD003) and a map of the directly relevant area owned and controlled by PHH is given in Appendix 2. The northern section of the site is

owned by the Stanbridge Family who have recently selected BHL as their development partner and Mr & Mrs Wiggett BHL and PHH are working closely together to bring forward the Broad Location.

4. Broad Location for Development

Subject to the matters described in this document, the parties for the site agree that Policy S6 (iv) is sound and robust in principle. SADC has undertaken its own assessments in plan preparation and is aware of the detailed site assessment work undertaken by PHH's consultant team. That evidence shows that the Site is suitable for development with no significant constraints to the development of the Broad Location in relation to any relevant matter, including environmental issues, heritage, transportation, ground conditions or utilities. The parties are confident that proposals can be delivered which are consistent with the requirements of policy, including the requirements of the site specific policy (subject to Section 5), which states as follows:

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 iv) - North Hemel Hempstead Broad Location

Objective

To provide a major urban extension of Hemel Hempstead. (Delivery of approximately 1,000 dwellings continuing beyond 2036)

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with Dacorum Borough Council, local communities, landowners and other stakeholders
- 2 Minimum capacity 1,500 dwellings
- The 1,500 dwelling figure above includes at least one 50+ bed C2 Residential or Nursing care home, at least one 50+ home C3 Flexi-care scheme and 12 units to provide special needs accommodation, in accordance with Policy L2
- 4 Minimum 40% Affordable Housing in accordance with Policy L3
- 5 Minimum overall net density 40 dwellings per hectare
- 6 Housing size, type and mix as set out in Policy L1 and Appendix 6
- 7 Strategic and local public open space, including managed woodland and ecological network links
- 8 Countryside access links including improved off-road paths (rights of way) and links to a community food zone retained in the Green Belt
- 9 A substantial new Country Park providing facilities for new and existing communities and a permanent green buffer to Redbourn
- 10 Retention of important trees and landscape features
- 11 A 3FE primary school, including Early Years provision, to serve the new community
- 12 Transport network (including walking and cycling links) and public transport services upgrades/improvements
- 13 3% of homes provided to be self-build housing
- 14 New neighbourhood and local centres, including commercial development opportunities
- 15 Recreation space and other community facilities, including health provision

- 16 Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands 17 Excellence in design, energy efficiency and water management
- 18 Appropriate renewable energy production and supply mechanisms

5. Outstanding Matters

The following limited outstanding matters remain between the parties, in regard to Policy S6 (iv):

- whether the requirement for 3% of homes to be delivered as self-build housing is best met on each Broad Location or more effectively met though a wider composite approach across all forms of delivery;
- 2. the way in which the delivery of the Broad Location is reflected in the plan's housing trajectory as currently set out at Appendix 2 of the Publication Draft Local Plan.

6. Masterplanning and Delivery

The parties confirm their willingness to progress a timely planning application in order to meet (or come forward sooner than) the programme of completions in the Local Plan housing trajectory.

Whilst still to undergo significant further iteration generally through the processes set out in the Strategic Sites Masterplanning Toolkit, including responding to public engagement, an indicative Framework Masterplan can be seen at Appendix 3.

7. Appendices

- 1. Local Plan Developer / Site Promoter Response Proforma
- A plan of the directly relevant areas controlled/owned by Pigeon Hemel Hempstead Ltd and the other landowners within the Broad Location Site
- 3. Indicative masterplan

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Signed:

Dated: 10 December 2019

Neil Waterson Senior Planning Manager On behalf of Pigeon Hemel Hempstead Ltd



Dated: 17th December 2019

David Joseph Senior Planning Director Bloor Homes Limited



Chris Briggs Spatial Planning Manager St Albans City and District Council

Proforma Responses by Landowner/Developer

Broad Location(s):	Sites S6(i), (ii), (iii) and (iv)		
Developer / Promoter:	The Crown Estate		

1. The draft Broad Location is 'available' There are no issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc.	Yes	Any Commentary: The Crown Estate is actively promoting the locations for development and confirm that they are available with no known constraints prohibiting the delivery of the allocations proposed. The Crown Estate owns the freehold of sites S6(i), (ii) and (iii). It is in active discussions with the owners of S6(iv) who are supportive of the sites inclusion within the emerging Local Plan.
2. The draft Broad Location is 'Deliverable / Achievable' There is a reasonable prospect that the development, including all key aspects being assessed as part of the overall 'package' proposed, is viable and deliverable	Yes	 Any Commentary: The sites are deliverable: Significant promotion and consultation work has bene completed over the last 4 years and it is the intention of the Crown Estate to submit an outline application for early phases to support the Local Plan process. The land for 3 of the 4 locations is in the ownership of the Crown Estate who promote land across the country for residential and employment development.

The proposed schemes are viable and can deliver the components of the allocation specific policies as currently drafted.

The sites can contribute towards key infrastructure such as improvements to Breakspear Roundabout and Junction 8 (as set out in the Maylands Growth Corridor Study), but TCE anticipate that other sources of funding and scheme contributions will be made available for these sub regionally important items.

3. The relevant draft Local Plan Policy requirements are acceptable and achievable

This includes specifically Policies L1
Housing Size, Type, Mix and Density; L2
Provision of Older Persons Housing and
Special Needs Housing; and L3 Provision of and Financial Contributions
towards Affordable Housing (including
specified mix of 'social rent', 'affordable
rent' and 'subsidised home ownership')
This also includes the matrix in Appendix
1 for Housing Mix / Tenure

Yes

Any Commentary:
The proposed schemes can deliver 40% affordable housing subject to viability and the delicate balance between delivering infrastructure and housing concurrently.

TCE broadly supports the suggested mix of 30% social rent, 30% affordable rent and 40% subsidised home ownership.

TCE intends to select a Registered Provider during each phase of the scheme to ensure that the quality, delivery and management of affordable homes remains high.

The exact mix of units for each tenure type will need detailed assessment through the Strategic Housing Market Assessment which will need to be updated regularly throughout the Local Plan period and the lifetime of the schemes. Any planning

	application will reflect the needs assessment relevant at that time.
4. The relevant draft Broad Location policy requirements (S6 – individual Broad Location as applicable) are acceptable and achievable.	Any Commentary: See below – Question 4 commentary
5. The relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) are acceptable and achievable	Any Commentary: See below – Question 5 commentary
6. The 'deliverable / achievable' community benefits (of all relevant kinds) to help the Council in consideration of 'exceptional circumstances', including any 'additionality' or 'beyond standard' elements, are considered to be (listed in brief, no specific limit on number):	1 Provision of a Secondary School 2 Package of Nickey Line enhancements (includes Redbourn) 3 Country Park 4 Multi modal interchange 5 Making provision for a wider Hemel Hempstead link road from Leighton Buzzard Road to M1 J8.
7. Any other important considerations which the Council should be aware of	None

Question 4 commentary. : S6 Requirements

The Broad Location requirements for sites S6(i), (ii) (iii) and (iv) are acceptable in principle. However, The Crown Estate (TCE) reserves the right to submit representations on the following points:

- Masterplanning TCE has already held public consultation events that have led to the masterplan evolving. Details can be found at http://easthemel.co.uk/. Significant consultation has also occurred with many statutory stakeholders to ensure that the masterplan reflects the needs of others and is deliverable. TCE are now holding regular pre-application meetings with SACDC officers, including the in-house masterplanner, to finalise the masterplan.
- Affordable Housing As stated above, the tenure split outlined in policy L3 is broadly acceptable to TCE albeit that the exact mix of unit types need to be determined via an up to date and robust Strategic Housing Market Assessment (SHMA) and at each application stage.
- 3. Self build plots TCE encourages flexible delivery of homes and is happy to provide a limited number of self-build plots subject to demand and needs based evidence as well as S106 details regarding delivery and take up.

Furthermore, TCE reserves the right to submit representations on the following details in respect of the Central Employment Zone (S6(ii))

S6(ii) (4 and 5) The land area split between B1 and B2 / B8 uses is too inflexible to accommodate employment change over the next 18 years

 S6(ii) (ii) TCE support the use of exceptional environmental opportunities but CHP should be used as an example and not a requirement since technology will evolve and CHP may not be the most appropriate technology.

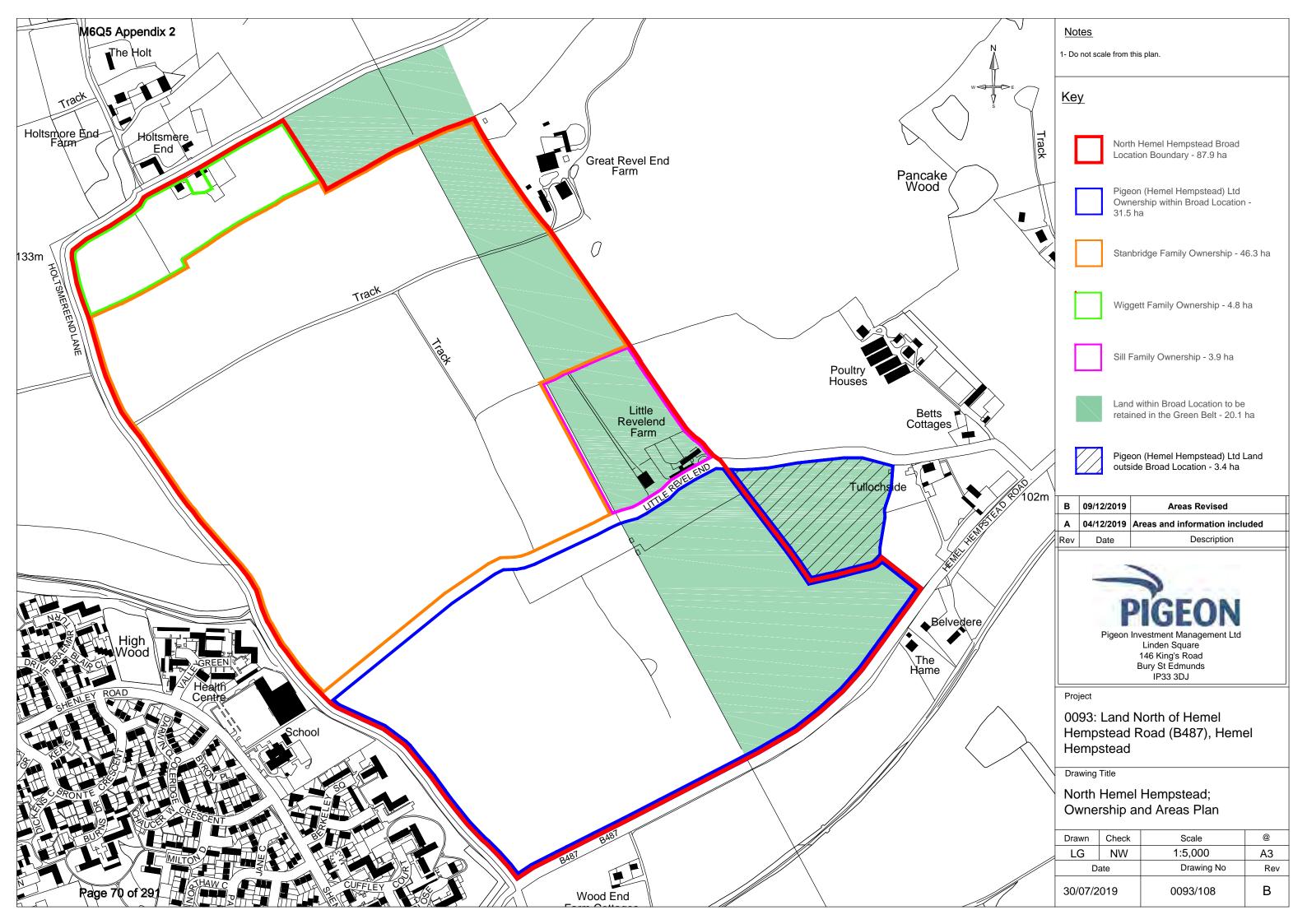
Question 5 commentary. : Policy Map Requirements

TCE accepts the broad conclusions of the SKM report but consider that the definition of detailed Green Belt boundaries does not reflect the guidance in the NPPF or the detailed master planning work that has been discussed with SADC. The detailed changes proposed by TCE are:

- S6(i) Rather than following the line of the overhead power lines, the Green Belt boundary should follow the built edge of the master plan development edge. This would show the Secondary School buildings and the inverted triangle of housing south of the Secondary School as excluded from the Green Belt
- S6(iii) A more robust and NPPF compliant Green Belt boundary would be to follow the A4147 to where it crosses the M1. Taking all this land out of the Green Belt does not imply that all this land will be developed. It is also considered that land south of Leverstock Green between the A4147 and Bedmond Road needs to be excluded from the Green Belt if the desired housing capacity is to be achieved. TCE is willing to share its capacity calculations with SADC+
 - S6(iv) Whilst TCE has no specific boundary proposal in this area, it is felt that a Green Belt boundary which follows the overhead power lines is not NPPF compliant. Traditional field boundaries would be more appropriate.

There are also two non-Green Belt comments on the Proposals Map:

- In area S6(i) the Secondary School notation extends too far south
- The area shown for M1 J8 improvements needs to be larger to include associated works (ie. drainage).







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13th December 2019

St Albans Local Plan - Statement of Common Ground between St Albans City & District Council (SADC) and Oaklands College – East St Albans Broad Location (S6 v)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC) and Oaklands College in relation to the Local Plan Broad Location S6 (v) - East St Albans. It concisely considers areas of agreement between the parties following the Oaklands College's representations on the St Albans Draft Local Plan in order to confirm the soundness and robustness of the Broad Location. It is anticipated that further agreed detail may be available by the time of the commencement of the Local Plan Hearing session on 21 January 2020.

The agreed matters in this SOCG do not preclude any further written or verbal representations that the District Council and Oaklands College may wish to make as part of the Local Plan Examination.

Oaklands College is working collaboratively, cooperatively, proactively and productively with SADC and all relevant partners to bring the site forward for development as set out in Policy S6 (v).

It is important to also consider alongside this document the signed Local Plan Developer / Site Promoter Response Proforma 2018 as set out at Appendix 1.

2. Legal Compliance; Duty to Co-operate and Sustainability Appraisal/Strategic **Environmental Assessment (SA/SEA)**

The parties consider that the Local Plan is legally compliant and consistent with national planning policy including the National Planning Policy Framework (2019). It is considered that St Albans City & District Council has fulfilled the Duty to Co-operate and that the Local Plan has been prepared in accordance with the timetable set out in the Local Development Scheme. Furthermore, it is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement and appropriate bodies have been consulted. A comprehensive and robust Sustainability Appraisal has also been carried out to support the Local Plan.

3. The Site

The site S6 i) is shown on the Draft Local Plan Policies Map (CD003) and a map of the directly relevant area controlled/owned by Oaklands College is given in Appendix 2.

4. Broad Location for Development

The parties for the site agree that Policy S6 (v) is sound and robust in principle and evidence shows that all requirements can and will be delivered at the point in time currently envisaged in the Plan:

Principal Zoe Hancock

This communication came from the following:

St Albans Campus V

Welwyn Garden City 🗖

Hatfield Road

The Campus

St Albans

Welwyn Garden City

Herts AL4 0JA

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01727 737000





Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 v) - East St Albans Broad Location

Objective

To provide an urban extension of St Albans, improved and new education and training facilities, and to further integrate Oaklands College with the wider community.

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with local communities, landowners and other stakeholders
- 2 Minimum capacity 1,250 dwellings (including area with extant permission for 348 homes)
- The 1,250 dwelling figure above includes at least one 50+ bed C2 Residential or Nursing care home, at least one 50+ home C3 Flexi-care scheme and 12 units to provide special needs accommodation, in accordance with Policy L2
- 4 Minimum 40% Affordable Housing in accordance with Policy L3
- 5 Minimum overall net density 40 dwellings per hectare
- 6 Housing size, type and mix as set out in Policy L1 and Appendix 6
- 7 Strategic and local public open space, including managed woodland and ecological network links
- 8 Retention of important trees and landscape features
- 9 A 2FE primary school, including Early Years provision, to serve the new community
- 10 A site for and appropriate contributions towards an 8FE secondary school site
- 11 Transport network (including walking and cycling links) and public transport services upgrades/improvements
- 12 Investment / reinvestment in improved education and training provision and facilities at Oaklands College
- 13 Retain, repair and make fit for purpose the Mansion House building
- 14 Hydrotherapy pool
- 15 3% of homes provided to be self-build housing
- 16 New neighbourhood centre, including commercial development opportunities
- 17 Recreation space and other community facilities, including health provision
- 18 Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands
- 19 Excellence in design, energy efficiency and water management
- 20 Site wide Combined Heat & Power system delivered in association with research and teaching initiatives at the College and its partner institutions
- 21 Appropriate renewable energy production and supply mechanisms
- 22 Best and most appropriate use of existing sand and gravel resources on site, rather than by prior extraction

NB: These requirements do not apply in respect of the extant permission for 348 dwellings referred to under point 2.

M6Q5 Appendix 2

Following questions raised in the Inspectors' Matters, Issues and Questions regarding the justification for the investment in Oaklands College (Matter 7v Q7) and the evidence to support the provision of a hydrotherapy pool (Matter 7v Q8), the College has issued a response identifying these needs (Appendix 3).

5. Masterplanning and Delivery

The parties confirm their willingness to progress a timely planning application in order to meet (or come forward sooner than) the programme of completions in the Plan housing trajectory. In this regard, a Planning Performance Agreement (PPA) is in the process of being agreed between the College and the Council. The draft PPA sets out the following broad anticipated timescales for development of the masterplan and delivery of a planning application:

- Masterplan to be approved in September 2020;
- Outline planning application to be submitted in January 2021;
- Outline planning application to be determined and planning permission issued in May 2021.

Subject to planning permission being granted, the College will enter into an agreement with a development partner to construct the development. This will be on the basis of one, or a series of, reserved matters applications being submitted and approved by the Council. It is expected that initial discussions will be had with shortlisted development parties in the Autumn of 2020 and it is anticipated that development could commence in 2022 with completion of the first phase of development estimated to be between 2023-2024.

Whilst still to undergo significant further iteration generally through the processes set out in the Strategic Sites Masterplanning Toolkit, including responding to public engagement, an indicative Masterplan can be seen at Appendix 4.

6. Appendices

- 1. Local Plan Developer / Site Promoter Response Proforma
- 2. A plan of the directly relevant area controlled/owned by Oaklands College
- 3. College response to Matter 7v Q7 and Matter 7v Q8
- 4. Indicative masterplan

Signatories:

Signed:

Dated:

13/12/19

Zoe Hancock On behalf of Oaklands College

Chris Briggs Spatial Planning Manager St Albans City and District Council

Broad Location(s):	Site S6 (v) – East of St Albans	
Developer / Promoter:	Oaklands College	

1. The draft Broad Location is 'available' There are no issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc. 2. The draft Broad Location is	Yes	 Any Commentary: The College supports, in principle, the provision of a secondary school and would be willing to work with the appropriate bodies to determine the appropriate place in due course, as the current suggestion is not feasible due to existing land use requirements. It is important that the policy is re-worded, to refer only to the 900 dwellings now proposed and not the 348 already being built. In relation to the neighbourhood centre and health provision, further discussion is needed with Council and community to understand and plan for need and optimal location within the site. Any Commentary:
'Deliverable / Achievable' There is a reasonable prospect that the development, including all key aspects being assessed as part of the overall 'package' proposed, is viable and deliverable		 The broad location is deliverable / achievable, subject to the comments under item 1 above. High level viability review has confirmed deliverability. The College proposes to use the disposal contract for the land to ensure that the appointed developer delivers the agreed benefits. The proposals are deliverable in line with the timetable contained within the draft housing trajectory.
3. The relevant draft Local Plan Policy requirements are acceptable and achievable This includes specifically Policies L1 Housing Size, Type, Mix and Density; L2 Provision of Older Persons	Yes	Any Commentary: The draft policy requirements are acceptable and achievable, subject to the points mentioned above in respect of item 1. L1 and Appendix 1- Housing Size, Type, Mix and Density –

Housing and Special Needs Housing; and L3 - Provision of and Financial Contributions towards Affordable Housing (including specified mix of 'social rent', 'affordable rent' and 'subsidised home ownership') This also includes the matrix in Appendix 1 for Housing Mix / Tenure		agreed and reflected in masterplanning work to date. • L2 Provision of Older Persons Housing and Special Needs Housing – this is agreed, as per the draft policy, to include at least one 50+ C2 residential or nursing care home and at least one 50+ home C3 flexi care scheme. • L3 - Provision of and Financial Contributions towards Affordable Housing (including specified mix of 'social rent', 'affordable rent' and 'subsidised home ownership') – proposed affordable housing quantum and mix agreed.
4. The relevant draft Broad Location policy requirements (S6 – individual Broad Location as applicable) are acceptable and achievable.	Yes	Any Commentary: • The broad location policy requirements are acceptable and achievable, other than in relation the secondary school (see response to item 1 above).
5. The relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) are acceptable and achievable	Yes	Any Commentary: • The relevant draft broad location requirements, as set out on the policies map, are acceptable and achievable, other than in relation the secondary school (see response to item 1 above).
6. The 'deliverable / achievable' community benefits (of all relevant kinds) to help the Council in consideration of 'exceptional circumstances', including any 'additionality' or 'beyond standard' elements, are considered to be (listed in brief, no specific limit on number):		 Education / community benefits: Improved education and training facilities. Athletics track to support Oaklands College athletes and additional sport facilities so support college and community needs. Refurbishment / rebuilding of remaining accommodation that is not being enhanced or rebuilt as part of the initial development stage – animal management centre, carpentry and joinery, motor vehicle workshops and ancillary farm needs. Enhancement of on-site student restaurant, to increase capacity.

Recreation space and community facilities inc health provision:

- Athletics track available for community use.
- Oaklands College facilities available for community use – sports, community centre, animal centre, equine facilities.
- Health provision to be developed further in discussion with council and community to understand and plan for need.
- New jogging track to be provided across residential and college site.
- Improved footpaths and cycle paths.
- Extended restaurant open to the public.
- Enhanced access to hydrotherapy pool.
- 2 FE primary school with early years provision:
 - Access to college facilities eg animal management centre, workshops etc to enhance curriculum.
 - High quality design in line with best practice educational standards.

Secondary school:

- Contribution to secondary school.
- Site allocation to be determined as detailed above.

Transport network including public transport and cycling/walking:

- Coopers Green Lane roundabout enhancement – capacity and safety.
- Further enhancement to Sandpit Lane/Marhalswick Lane junction – capacity.
- Residential access to site enhancing Sandpit Lane/House Lane junction – capacity.
- New access route to College safer access; relieve traffic pressure on Highways.

- Bus route through residential from Sandpit Lane to Hatfield Road allows students to be dropped/collected safely on campus; allows residents sustainable access to train and employment centres; removes bus and pedestrian congestion on Hatfield road improved safety.
- Cycling route enhanced North to South and improved access onto existing Alban Way cycle route with access to train station.

Open public space – managed woodland, ecological network links:

- Connection with Taylor Wimpey development.
- Large areas of residential amenity space with wide habitat corridors, new native trees planted, existing habitats enhanced.

Excellence in design, energy efficiency and water management:

- East west orientation maximising solar gain to living and amenity spaces.
- Sedum roods assisting water retention by delaying run-off and reducing localised flash floods.
- Rainwater collection and storage underground for grey water flushing and irrigation.
- Solar collection to provide heat energy needs.
- Fabric first approach to dwellings ensuring energy conservation.
- Sustainable drainage integrated through swales and reed beds.

CHP:

Cross site and linking to college.

7. Any other important considerations which the Council should be aware of

M6Q5 Appendix 2

Signed:

Vincent Gabbe, Director, Lambert Smith Hampton

On behalf of:

Oaklands College

Dated:

31st May 2018



NOTE: OS MAP USED TO PRODUCE THE LOCATION PLAN DRAWING. ACCURACY APPROXIMATE.

For Information

1 | Naoroji Street | Clerkenwell | London | WC1X 0GB

0207 553 3030 www.dla-design.co.uk

Oaklands College Local Plan

St Albans

Location Plan Land Ownership Plan

SCALE 1:2500 @ A1 15/11/2019 **DLA REF**

2019-070 **DRAWING**

PROJECT ORIGINATOR ZONE LEVEL TYPE ROLE NUMBER

OT

DN

2019070 DLA 01 00 DR A 10001 SUITABILITY DESCRIPTION

REVISION DESCRIPTION

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9th December 2019

What is the justification for investment in Oaklands College?

Oaklands College is a general further education college. Further education colleges in England provide high-quality technical and professional education and training for young people and adults. They prepare over three million people with valuable skills for the workplace, helping to develop their career opportunities and strengthen the local, regional and national economy.

Colleges are inspirational places to learn because education and training is delivered by expert teaching staff in industry-standard facilities to ensure that students are ready to enter into the world of work, having experienced a realistic work environment that is up to date and reflects modern practice in the relevant industry. From basic skills to degrees, colleges offer first rate academic and vocational teaching, in a range of professions including engineering, hospitality, IT, construction and the creative arts.

Oaklands College is situated in St Albans and Welwyn Garden City in Hertfordshire. It is a large general Further Education college with land-based programmes offering an extensive range of provision in all 15 subject sector areas and all age groups. The Oaklands College catchment area covers three district or borough councils: Hertsmere, St Albans and Welwyn and Hatfield. The overall population is 350,000 (2011 Census), with approximately 12% of the population aged between 16-24 years.

The College's mission is:

"To provide the opportunities and the support to ensure our communities reach their full potential"

The strategic aims are:

Skills and behaviours - To equip students with the skills and behaviours they will need to play a productive role in the economy and in their communities

Curriculum - A high quality curriculum provision that meets the needs of students, employers and key stakeholders

People - A motivated staff team with high aspirations for all and an unrelenting focus on the mission and values of the college

Money - A clear focus on financial sustainability to enable investment in our students; now and in the future

Partnerships - Highly developed partnership working with key stakeholders which support the development of the college and its communities

The College has over 10,000 students. 3,200 of these are 16-18 year olds who are predominantly full-time on study programmes which will lead on to further education, higher education or employment. The College has a nationally recognised provision for students with high needs, with over 200 students accessing high needs funding, travelling from over

ten different local authorities. The College has an extensive and growing apprenticeship provision. It also offers higher education in partnerships with the University of Hertfordshire, as well as in its own right. The College also provides courses for adults to upskill or reskill, or to develop essential English and Maths skills, and to return to employment.

In November 2017 the Secretary of State, in relation to the planning decision for the Taylor Wimpey scheme and the redevelopment of the Oaklands College campus, recognised the weight that should be given to the educational development of the College:

"Like the Inspector, the Secretary of State considers that the importance of the delivery of high quality education is a national and local priority and he notes that this is common ground between the parties. He also notes Oaklands College is agreed to be the main provider of further education in the District and the quality of the educational offer at the College is not in dispute. The Inspector reports that many of the existing buildings are of very poor quality and are wholly unsuited to the provision of the high standard of education which the College continues to provide. Other buildings are temporary structures which have clearly outlived their normal life, and are in a poor state of repair (IR 193) and that a backlog of expensive maintenance has built up, and the running costs of the buildings have escalated (IR 194)."

The achievement of the 348 unit planning scheme with Taylor Wimpey has enabled Oaklands College to start delivery on the major campus redevelopment project that was so desperately needed. However, there are still some areas of the College that need development. This includes the following:

- Refurbishment/rebuild of remaining accommodation animal management centre, carpentry and joinery, motor vehicle site
- Enhancement of on-site student restaurant "The Stables"
- Mansion house refurbishment for use as community, business and educational benefit
- Athletics track to support Oaklands College athletes and additional sport facilities so support college and community needs

There is a requirement to improved access to the site. Investment is needed to provide enhanced and safer cycling and pedestrian access. An improved road infrastructure would enable buses to access the site so that students can access College in a much safer way and reduce the impact of local residents.

Although the major campus development has allowed for some upgrades to the infrastructure (water, gas, electricity etc) there is more investment required to provide an up to date and resilient site wide infrastructure that will enable the college to operate effectively in the long-term.

What is the evidence to support the provision of a hydrotherapy pool?

Phase one of the development at St Albans, the Discovery Centre, met the needs of those students with profound and complex or severe learning difficulties or disabilities who had previously been housed in the worst accommodation onsite. The new facilities are state-of-the-art and have already made a considerable difference to these students'

lives and opportunities. This provision, referred to internally and externally as "Springfield", was already a unique offering nationally in terms of the scope and range of the education and care opportunities provided, and it now has enviable facilities to match its high reputation.

Demand for this provision continues to increase year on year due to the specialist nature of the facilities on offer, the quality of our provision, and the fact that there are limited alternatives available for people who have these specialist requirements.

Within this area there are a large number of students with severe and complex learning difficulties and disabilities, many of whom have life---limiting conditions and who require therapeutic input on a daily basis. Hydrotherapy is a highly effective way of aiding these students, but such facilities are currently not available onsite at the College; given the particular needs and requirements of many of the Springfield students, this means that a large proportion of those students do not have access to the facilities they need – at best not as regularly as their needs require, and at worst not at all.

Hydrotherapy is a form of treatment which involves immersing the body in water, typically maintained at a temperature of 34-35°C (i.e. just below body temperature), which eases joint pain and ensures maximum comfort of movement. By immersing the body in water, pressure is taken off painful or stiff joints and as a result allows greater movement; over time this aids in the rebuilding of muscle strength and mobility.

Hydrotherapy is a fun and relaxing environment that students and patients respond to and which cannot be replicated easily in other environments. It is needed in order to maintain physical and mental progress and to prevent deterioration of students' mobility, which in turn directly impacts on their daily life. Regular access to such facilities can prolong life and improve their overall health. This is particularly important for those students who are unable to walk unaided or use walking aids — within a hydrotherapy pool setting these students can often walk independently, significantly improving their self-esteem, as well as muscle maintenance and co-ordination.

Hydrotherapy also aids recovery from injury and surgery where other forms of therapy cannot be used – not just in relation to students with health or mobility issues, but also in relation to sports students, helping them to recover faster and more effectively from injuries and training sessions. In particular, hydrotherapy is an excellent way to aid the rehabilitation of those suffering from severe injuries where weight-bearing exercises cannot be performed; for example, Achilles rupture, fractured ankles and metatarsals.

Physiotherapy treatment in a hydrotherapy pool can offer a relaxed, warm and calming environment, with the effects of treatment being longer lasting due to the impact of the water's heat on muscle activity.

College Need

Currently there is no hydrotherapy pool at the College, with students required to travel to the few specialist facilities in the surrounding areas, such as Keech Hospice in Bedford (23 miles from the College) or occasionally Breakspeare School in Abbotts Langley (10 miles away). Historically there was provision within St Albans City Hospital (3 miles away), but this facility has now been closed down. It should be

M6Q5 Appendix 2

noted that a 'normal' pool is not warm enough to provide the benefits as mentioned above.

Where alternatives are available, the ability of the College to utilise them is limited by general demand for such specialist facilities, plus the limitations of the students' particular needs. Travel to any of these facilities needs to be by mini bus, which in turn impacts on which and how many students can be taken, particularly considering the fact that the majority tend to be wheelchair-bound. The timing and duration of journeys also determine which students are able to access hydrotherapy, due to medications and feed times. For those who are able to access sessions off-site, a whole day's learning can often be lost just so that they can attend a 20 minute hydrotherapy session. Many of the Springfield students are as a result unable to access hydrotherapy at present.

The provision of a hydrotherapy pool at the College would alleviate these issues, providing access to the benefits of this treatment for all of the College's students. It would also provide continuity of care, as a lot of the College's students have previously regularly accessed hydrotherapy at school. Finally, it would enhance the students' college experience endlessly and further expands on the College's holistic approach to learning and care.

Finally, the provision of a hydrotherapy pool onsite would significantly enhance the College's curriculum offering within the Sports area, particularly courses concerning Prevention of Injuries as well as the HND and Foundation Degree courses in Sports, which include modules on hydrotherapy.

Community Need

It is also intended that the proposed facility will be available for wider community use, to both NHS and private patients and individuals. These benefits could include not only the wide range of care, rehabilitation and recovery options which hydrotherapy can provide, but could also be used in conjunction with the other facilities available at the College.

The proposed hydrotherapy pool could also provide a base for out-of-hours clubs and support groups for students, parents and carers.

It is intended that this community use would primarily take place outside of normal College hours. Given this and also the size of the proposed facility no significant increases in traffic or numbers of visitors onsite are foreseen as a result of these facilities.

OAKLANDS COLLEGE STRATEGIC LOCAL PLAN

Updated February 2018













Introduction

The mission of Oaklands College is to realise the potential of its communities. It has served the particular community of St Albans City and District for many years, evolving its offer in line with employer, economic and community needs. It is with this in mind that we have responded to the Local Plan that is being developed for St. Albans City and District Council.

The College does face major challenges in achieving its mission as, alongside the ongoing cuts in public sector funding, the College has significant issues around vital parts of its estate and facilities. Many of the teaching facilities are dilapidated and in need of urgent repair and unless funds are secured to invest in these facilities, the future of Oaklands as a community asset will be put at risk. The securing of the site will not only enable the College to provide effective educational facilities now but long into the future as the land receipt would only be used for the purposes of Oaklands College, which is ensuring that we provide a high quality responsive curriculum offer that meets the needs of those we serve.

Our vision for the site is to create high quality new homes set within an integrated sustainable masterplan connecting directly into the College; putting the College even more firmly at the heart of the community with public access through footpaths and cycle paths to our parkland and our agricultural setting.

The Oaklands Masterplan provides a once in a generation opportunity to establish a community which can offer a wide range of benefits and opportunity to its residents that at its heart is focussed on education and the improvement of lives.

Oaklands College is an exempt charity and as such must apply its resources for the public benefit. All of the value generated from the development of this site will be used to meet the needs of the community that Oaklands College serves, ensuring that all of our students are able to reach their potential.

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- Recreation, Amenity Facilities & Events (SLP 7)
- Strategic & Local Public Open Space
- Sports Facilities (SLP 7)
- The Need for a New College Campus
- The Proposed College Masterplan
- Education Facilities (SLP 6)
- The College Masterplan Design Approach
- Minimising Impact within the Green Belt

07 DELIVERY TIMETABLE & PHASING

08 TRANSPORT NETWORK & PROPOSED IMPROVEMENTS

01

Highway Improvements

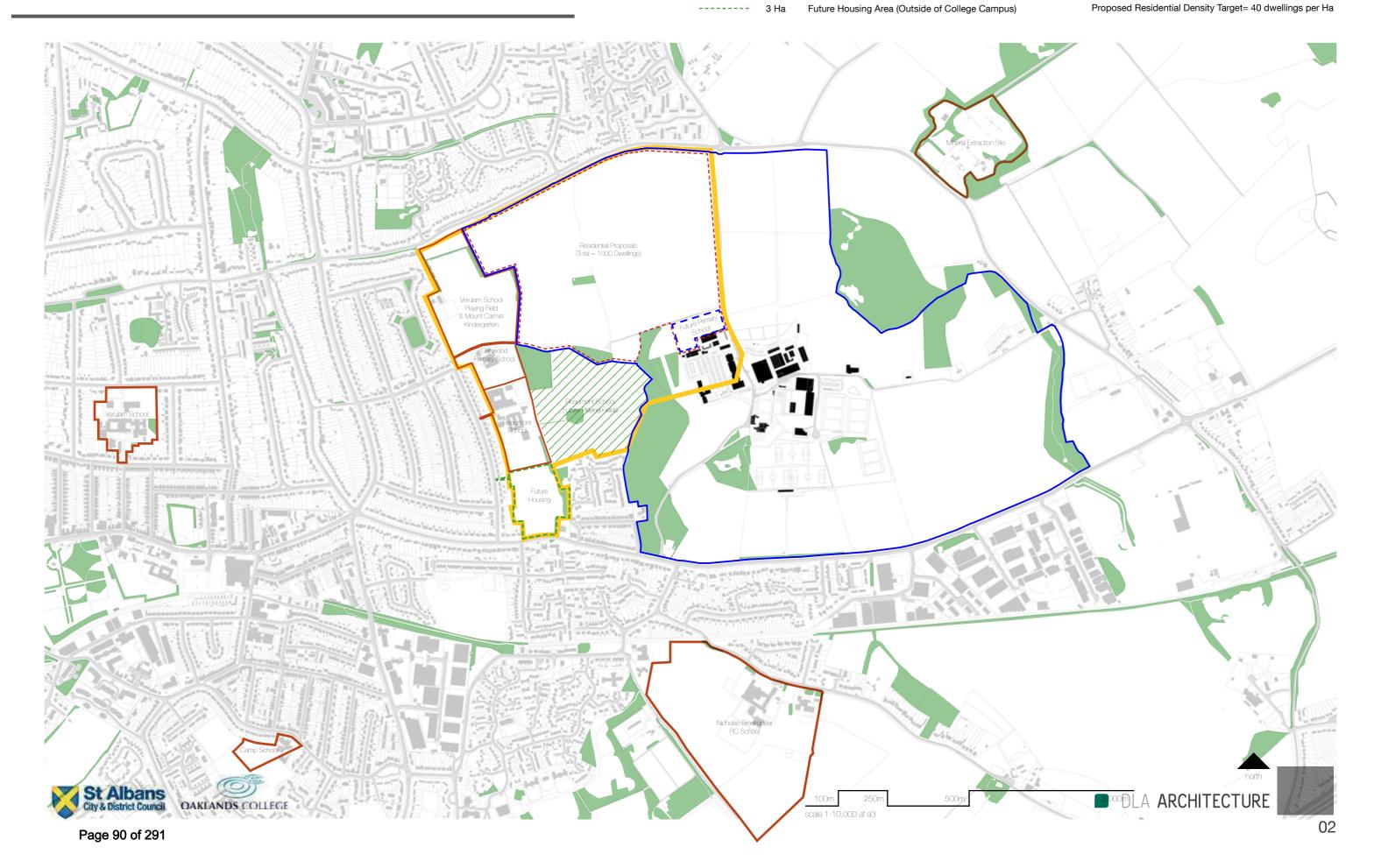
SUMMARY

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LAND OWNERSHIP & DEVELOPER POSITION



Total Number of Dwellings = 1000 (348 Approved & 652 Proposed)



AERIAL PHOTOGRAPHS OF THE SITE



Aerial view above from the South-West of the College Campus



Aerial view above from the North-West of the College Campus



Aerial view above from the South-East of the College Campus



Aerial view above from the North of the College Campus





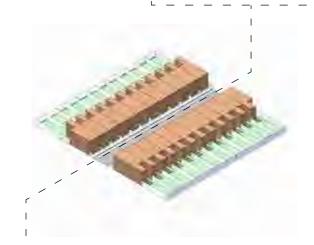
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HOUSING DENSITY & A COMPARISON OF EXISTING HOUSE TYPES WITHIN ST. ALBANS

The terrace house has been selected as the core typology for housing design. It is regarded as a highly successful model in **St Albans**. The Masterplan proposes a 21st Century version of the successful Victorian Terrace House.

Existing St Albans Terrace Housing

Alexandra Road



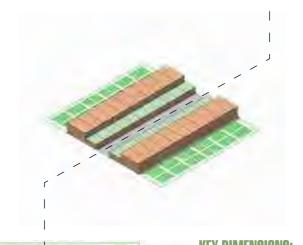
KEY DIMENSIONS:

- 8.0M DEEP DWELLING
- 3.5M REAR EXTENSION
- 1.5M FRONT GARDEN
- 10M REAR GARDEN
- 1.2M FOOTPATH



Terrace Housing, Alexandra Road, St. Albans







KEY DIMENSIONS:

- 10M DEEP DWELLING
- 6M GARAGE / TERRACE
- 1.5M INTEGRAL AMENITY SPACE
- 12.5M PUBLIC OPEN SPACE



Stirling Prize winning Accordia Development



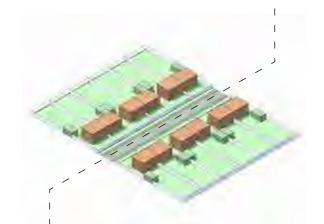


HOUSING DENSITY & A COMPARISON OF EXISTING HOUSE TYPES WITHIN ST. ALBANS

The Masterplan proposes a 21st Century version of the St. Albans semi-detached house type.

Existing St Albans Housing

Barnfield Road off Sandpit Lane



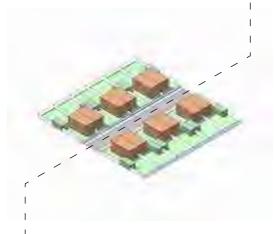
KEY DIMENSIONS:

- 6.5M DEEP DWELLING
- 5.5M FRONT GARDEN
- 25M REAR GARDEN
- 1.8M FOOTPATH



Semi-detached Housing, Barnfield Road, St. Albans





KEY DIMENSIONS:

5.5m access road



- **5M FRONT GARDEN**
- 5M GARAGE
- 5M REAR GARDEN
- 1.8M FOOTPATH



Stirling Prize winning Accordia Development





4.5m access road

DLA ARCHITECTURE

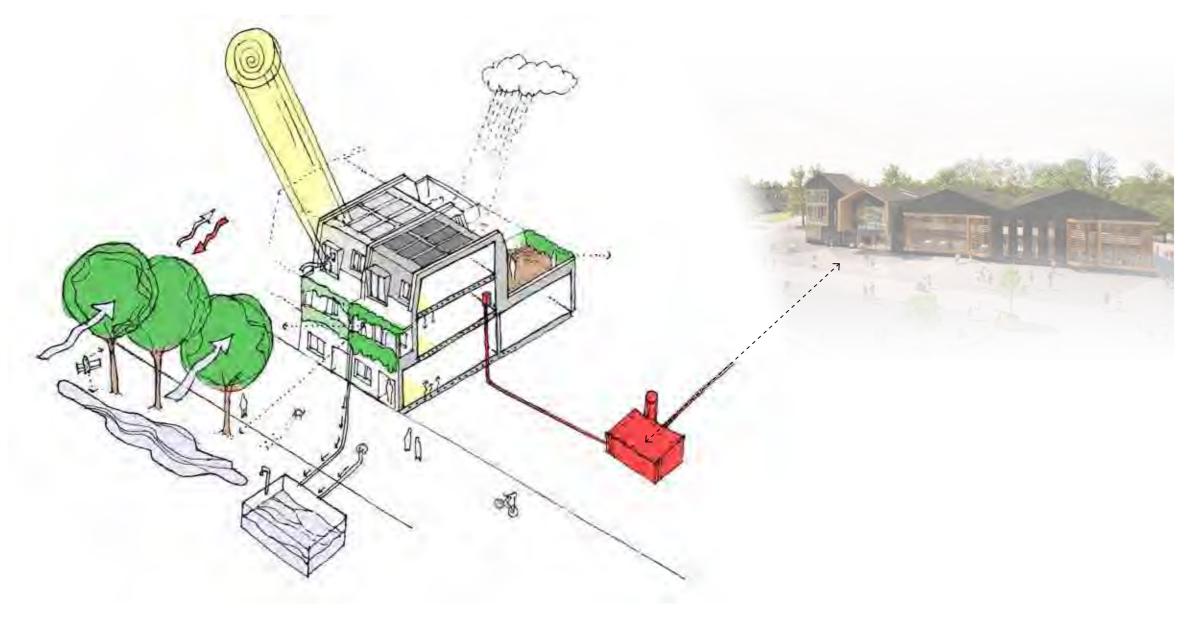
A SUSTAINABLE COMMUNITY SUSTAINABLE DESIGN & INNOVATION

THE MASTERPLAN MAKES PROVISION FOR:

- COMBINED HEAT & POWER (CHP) DISTRIBUTION ACROSS THE SITE
- SITE-WIDE NETWORK OF GREEN CORRIDORS, PEDESTRIAN ROUTES, SHELTERBELTS & PUBLIS SPACES CREATING A SUSTAINABLE FRAMEWORK FOR THE NEW HOMES THAT WILL SIT WITHIN,
- A 'FABRIC FIRST' APPROACHTO INDIVIDUAL DWELLINGS ENSURING ENERGY CONSERVATION

THE DIAGRAM ON THIS PAGE IDENTIFIES SOME OF THE ENVIRONMENTAL PRINCIPLES INTENDED AS PART OF THE MASTERPLAN PROPOSALS, INCLUDING:

- Dwellings are sited in an east west orientation maximising solar gain to living and amenity spaces,
- Sedum Roofs which assist in water retention by delaying run-off and reducing localised flash floods,
- Rainwater collection and storage underground for grey-water flushing and irrigation,
- Solar collection designed to provide heat energy needs,







8 QUALITY BUILDINGS

APPROACH TO DESIGN:

Good quality housing design grows from establishing a coherent vision from the outset. The terrace house has been selected as the core typology for housing design. It is regarded as a highly successful model in St Albans, and one of the key strengths of the terrace house is its capacity for future adaptation, and contribution to a fine-grain masterplan

KEY DESIGN PRINCIPLES:

- HIGHLY SUSTAINABLE, HARNESSING PASSIVE METHODS
- A COMBINATION OF NEW BUILD AND SELF-BUILD HOUSE TYPES
- TRADITIONAL STREET ARRANGEMENT, WITH A CLEAR HIERARCHY OF STREETS
- FRONT DOORS AND LIVING ROOMS ADDRESSING THE STREET
- HIGH QUALITY ROBUST MATERIALS
- MINIMISE CAR MOVEMENT
- INTEGRATED PUBLIC TRANSPORT ROUTES
- NATURAL SURVEILLANCE HARNESSED
- A VARIATION IN HOUSING TYPOLOGIES
- HOMES DESIGNED FOR FUTURE ADAPTABILITY

Public spaces, such as gardens and squares, are linked directly to the network of routes that links the site to Oaklands College and the adjacent landscape.

Stirling Prize winning Accordia Development







Carbon-neutral Bedzed & Rural Zed







The images above are of Accordia, Cambridge, which was the 2008 Sterling Prize award winning, residential scheme and BedZed, Beddington, London which is a carbon-neutral residential development, which set new standards in sustainable design.





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■ DIA ARCHITECTURE

SLP 10 - HOUSING SIZE / TYPE & MIX AFFORDABLE & PRIVATE HOUSING

- A SUGGESTION OF THE POTENTIAL HOUSING MIX WITHIN THE MASTERPLAN IS SET OUT IN THE TABLE BELOW
- THE SIZE OF UNITS SUGGESTED HAS DRAWN ON THE COUNCIL'S 'STRATEGIC HOUSING MARKET ASSESSMENT' (SHMA) DOCUMENT AS A STARTING POINT,
- 42% AFFORDABLE HOUSING PROVISION IS PROPOSED ACROSS THE MASTERPLAN,
- HOUSE SIZE IS FOCUSED ON SMALLER DWELLINGS, PARTICULARLY 2 & 3 BEDS IN ORDER TO PROVIDE MUCH NEEDED PROVISION FOR FIRST TIME BUYERS &
 RETIRED PEOPLE,
- FEWER 1 BED UNITS HAVE BEEN PROVIDED REFLECTING THE LOCATION OF THE SITE, AWAY FROM THE CITY CENTRE,

Housing Mix

	No. Beds	No. Dwellings	%
Open market	1 bedroom apartments	20	2
	2 bedroom apartments	30	3
	2 bedroom houses	82	8
	2 bedroom flat over garage	18	2
	3 bedroom houses	278	28
	4 bedroom houses	109	11
	4 bedroom self build eco-house	7	1
	5 bedroom houses	35	4
	Total	579	58
Affordable	1 bedroom apartments	63	6
	2 bedroom apartments	33	3
	2 bedroom flat over garage	20	2
	2 bedroom houses	138	14
	3 bedroom houses	167	17
	Total	421	42
Total		1000	100

SHMA Comparison

Tenure	Shared	1 bed	2 bed	3 bed	4+ bed	Total no.	Total %
Affordable	0	44	134	117	0	295	29.47
Intermediate	0	19	57	50	0	126	12.63
Market	0	20	130	278	151	579	57.90
Total no.	0	83	321	445	151	1000	100
Total %	0	8.30	32.10	44.50	15.10	100	
From the SHMA		21.49	19.87	51.34	7.3	100	

SLP 10 - HOUSING SIZE / TYPE & MIX AFFORDABLE PROVISION

THE AFFORDABLE HOUSING PROVISION INCLUDES:

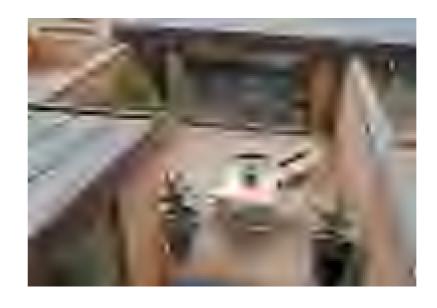
- 42% AFFORDABLE HOUSING, WHICH EXCEEDS THE COUNCIL'S **TARGET**
- 61% WILL BE SOCIAL RENT INCLUDING KEY WORKER PROVSION.
- 39% WILL BE INTERMEDIATE TENURE
- PROVISION FOR COLLEGE WORKERS WITHIN THE DEVELOPMENT
- 30% OF AFFORDABLE HOUSING WILL BENEFIT FROM ZERO CARBON PROPOSALS & COMBINED HEAT & POWER (CHP) ENABLING REDUCED FUEL BILLS.
- THE AFFORDABLE HOUSING WILL DISTRIBUTED ACROSS THE ENTIRE MASTERPLAN ALLOWING FOR INTEGRATION WITH PRIVATE OWNERSHIP.

PLANNING AUTHORITY DESIGN REVIEWS & CABE **REVIEW:**

- POLICY SLP13 REFERS TO MASTERPLANNING THE PROPOSALS IN COLLABORATION WITH THE COUNCIL. THE COLLEGE CONSIDER THAT THIS WOULD BE A HELPFUL AND POSITIVE APPROACH.
- THE DESIGN TEAM WOULD WELCOME REGULAR DESIGN REVIEWS WITH THE LOCAL AUTHORITY AND WITH BEST PRACTISE ORGANISATIONS SUCH AS THE COMMISSION FOR ARCHITECTURE AND THE BUILT ENVIRONMENT (CABE)









The images above are of Accordia, Brooklands Avenue, Cambridge and illustrate the design of the affordable housing element of the 2008 Sterling Prize award winning, residential scheme.

These homes were designed to a ground breaking standard for affordable homes and achieved an Eco homes rating of Very Good - the equivalent to the current Code for Sustainable Homes level 4.



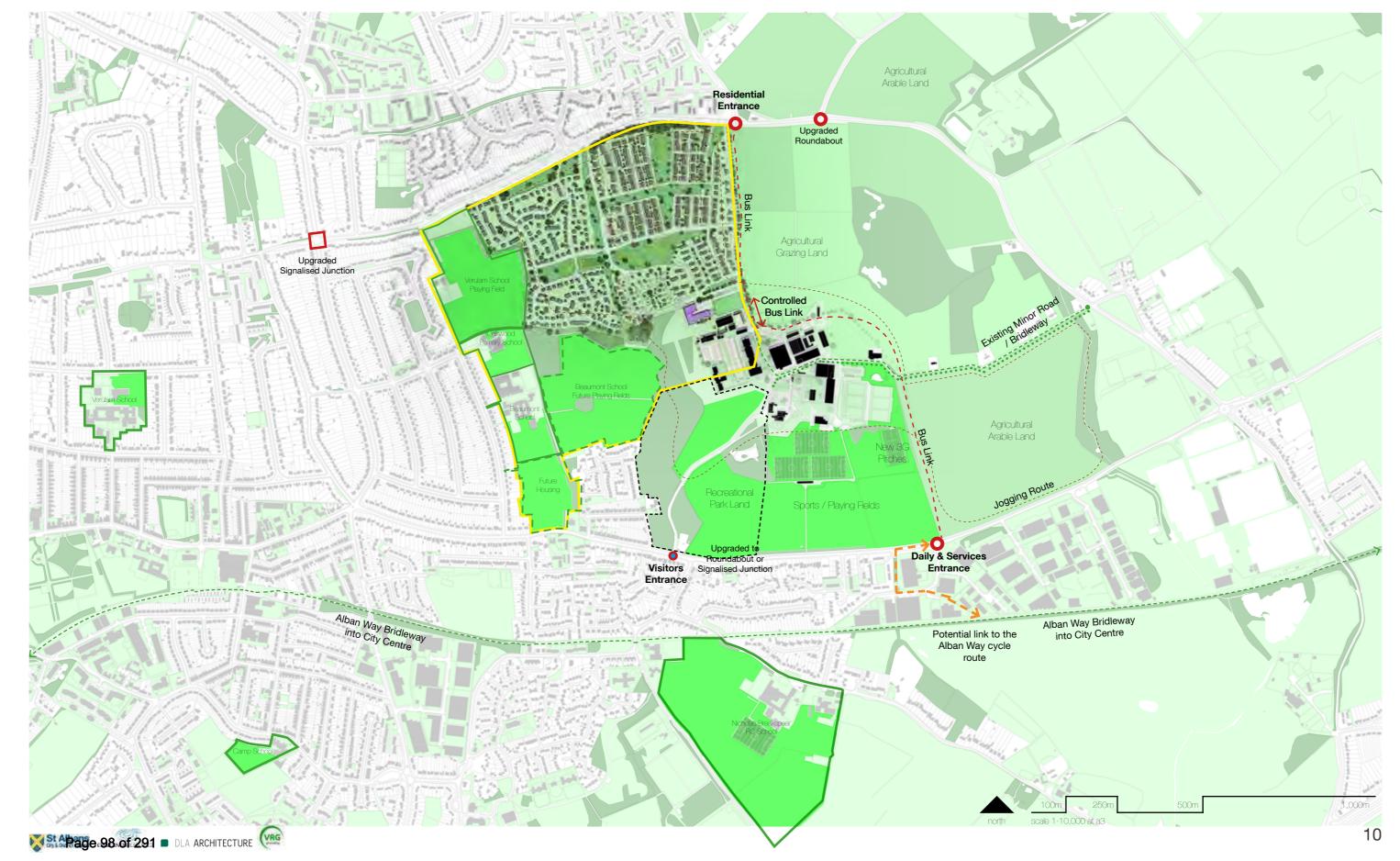




COMMUNITY & EDUCATION BENEFITS MASTERPLAN & WIDER CONTEXT OVERVIEW

- A SUSTAINABLE & SENSITIVE GREEN BELT USE,
- ZERO CARBON AFFORDABLE HOUSING,
- HIGH QUALITY PRIMARY SCHOOL & COLLEGE PROPOSALS,
- COMMUNITY SPORTS, RECREATION FACILITIES & EVENTS.
- IMPROVED TRANSPORT PROPOSALS





A PROPOSED SUSTAINABLE MASTERPLAN S3: EAST OF ST ALBANS

LARGE AREAS OF RESIDENTIAL AMENITY SPACE WITH WIDE HABITAT CORRIDORS

A COMBINED HEAT AND POWER FACILITY AT THE CENTRE OF THE SCHEME

SUSTAINABLE DRAINAGE INTEGRATED INTO THE MASTERPLAN THROUGH SWALES AND REED BEDS

A NEW TWO FORM ENTRY PRIMARY SCHOOL ABLE TO LINK WITH OTHER SCHOOLS IN THE AREA BUT ALSO WITH THE COLLEGE

COMPREHENSIVE NEW ROAD JUNCTION IMPROVEMENTS

INVIGORATING OPEN PUBLIC GREEN SPACES WITH SHARED ALLOTMENTS, ALONGSIDE PRIVATE GARDENS AND WOODLAND AREAS



A MIX OF HIGH QUALITY DESIGNED HOMES

42% AFFORDABLE
HOUSING IN LINE WITH
THE REQUIREMENTS
OF THE LOCAL
COMMUNITY

SELF-BUILD CODE LEVEL 6 EXPERIMENTAL HOMES WHICH WOULD ALSO BE USED AS A TEACHING TOOL FOR THE COLLEGE

COLLEGE SQUARE AS PART OF THE CURRENT MASTERPLAN.

THE COLLEGE AT THE HEART OF THE COMMUNITY & EDUCATION

IMPROVED PUBLIC
ACCESS TO COLLEGE
SPORTS FACILITIES





DLA ARCHITECTURE

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COMMUNITY & EDUCATION BENEFITS ZERO CARBON RESIDENTIAL MASTERPLAN

ZERO CARBON RESIDENTIAL MASTERPLAN WITH THE FOLLOWING BENEFITS:

- AN EXEMPLAR HIGH QUALITY RESIDENTIAL MASTERPLAN, WITH ZERO CARBON PROPOSED FOR 650 OF THE DWELLINGS.
- 30% OF AFFORDABLE HOUSING WILL BENEFIT FROM THE ZERO CARBON PROPOSALS. THIS HIGH PERCENTAGE WILL BENEFIT FROM REDUCED FUEL BILLS.
- SELF-BUILD CODE LEVEL 6 EXPERIMENTAL HOMES TO BE LOCATED WITHIN THE EASTERN PORTION OF THE MASTERPLAN, WHICH WOULD ALSO BE USED AS A TEACHING TOOL FOR THE COLLEGE.
- A COMBINED HEAT AND POWER FACILITY AT THE CENTRE OF THE SCHEME AND SERVING 652 OF THE DWELLINGS, WHICH WOULD BE CELEBRATED RATHER THAN HIDDEN AND USED AS A TEACHING TOOI.
- SUSTAINABLE DRAINAGE INTEGRATED INTO THE MASTERPLAN THROUGH SWALES AND REED BEDS

SUSTAINABLE INITIATIVES INCLUDED WITHIN THE MASTERPLAN:



GREEN SPACE Intensive Green roofs for attenuating surface run-off. Carbon dioxide absorbing. Increase in biodiversity.



BIRD DIVERSITY Introduction of small birds to control insects with close proximity to vegetable gardens.



LANDSCAPE CONTROL Deciduous summer cooling for shade, with winter heating. Dust pollutant reduction from traffic. Bird



SOLAR SHADING Solar control considered through building orientation, tree planting.



Combined Heat and Power facility on-site that will generate a portion of the site's energy requirements.



BUILDING MASS Thermal mass from the building structure to increase thermal mass and regulate the internal temperature.



PASSIVE HEATING & NATURAL LIGHTING Winter sun can assist with heating





SUSTAINABLE MATERIALS Brick and other locally sourced materials to ground the scheme and contextualise the new build with its surroundings



RAINWATER COLLECTORS Rainwater harvesting, using water butts and lagoons will allow on-site storage of water.



WATER CLEANING Grey water will be processed by organic vegetation and trees on site.

St Albans



DLA ARCHITECTURE

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COMMUNITY & EDUCATION BENEFITS A NEW 2 FORM PRIMARY SCHOOL



THE NEW PRIMARY SCHOOL WILL:

- A MUCH NEEDED SCHOOL PROVISION TO ST. ALBANS,
- ENABLE AN EXCITING EDUCATIONAL OPPORTUNITY FOR THE PRIMARY SCHOOL CHILDREN TO ACCESS ALL THE COLLEGE FACILITIES - ANIMALS, WORKSHOPS, SPORTS & MORE,
- BE LOCATED IN A BEAUTIFUL LANDSCAPE SETTING,
- BE A HIGH QUALITY ARCHITECTURAL DESIGN,
- INCLUDE ENGAGEMENT WITH LOCAL SCHOOLS TO EXPLAIN THE DESIGN & CONSTRUCTION PROCESS,



There are also opportunities to engage neighbouring Schools in the design and construction process through workshops and site visits tailored to particular curriculum interests and age ranges.

















DLA ARCHITECTURE

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COMMUNITY & EDUCATION BENEFITS RECREATION, AMENITY FACILITIES & EVENTS:

THE PROPOSALS PROVIDES THE FOLLOWING:

- A MASTERPLAN THAT ALLOWS RESIDENTS AND THE GENERAL PUBLIC TO ACCESS THE COLLEGE PARK LANDS AND LAKE,
- LARGE AREAS OF RESIDENTIAL AMENITY SPACE WITH WIDE HABITAT CORRIDORS, CONSIDERABLE NUMBERS OF NEW NATIVE TREES PLANTED AS WELL AS EXISTING HABITAT AREAS ENHANCED,
- AN EXTENSIVE NETWORK OF RIGHTS OF WAY IMPROVEMENTS, INCLUDING IMPROVED FOOTPATHS, JOGGING ROUTES & CYCLE PATHS,
- A PEDESTRIAN AND CYCLE LINK FROM THE RESIDENTIAL DEVELOPMENT TO HATFIELD ROAD AND TO THE ALBAN CYCLE WAY.
- THE COLLEGE WILL CONTINUE TO HOST EVENTS SUCH AS SUMMER FAYRE, LAMBING DAY, YOUNG CHEF OF THE YEAR, TO ENABLE COMMUNITY ACCESS TO THE COLLEGE AND ITS FACILITIES.
- THE REVIEW OF THE GYPSY AND TRAVELLER ASSESSMENT SUGGESTSTHATTHEEAST OF STALBANS IS NOT A PREFERRED LOCATION FOR SUCH PROVISION HOWEVER OAKLANDS COLLEGE WILL WORK WITH THE COUNCIL TO ASSESS THE NEED AND WOULD BE ABLE TO MAKE A MODEST OFF-SITE CONTRIBUTION OR REVIEW OTHER LAND-HOLDINGS IF DEEMED APPROPRIATE.

















DLA ARCHITECTURE

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COMMUNITY & EDUCATION BENEFITS RECREATION, AMENITY FACILITIES & EVENTS:

THE DEVELOPMENT PROVIDES THE FOLLOWING:

- 'HAVE A GO DAYS' PROVIDE: THE LOCAL COMMUNITY TO TRY
 THE EXTENSIVE RANGE FACILITIES & COURSES THE COLLEGE
 HAS TO OFFER, INCLUDING ANIMAL CARE, THE ARTS AND
 CONSTRUCTION & ENGINEERING,
- OAKLANDS COLLEGE HOSTS THE ANNUAL PRIMARY SCHOOLS OLYMPICS,
- OAKLANDS COLLEGE IS A CONTRIBUTOR TO & VENUE FOR ST. ALBANS FASHION WEEK,
- IF REQUIRED A GP SURGERY / PHARMACY COULD BE INCLUDED WITHIN THE MASTERPLAN OR ALLOCATION MADE TOWARDS AN OFF SITE CONTRIBUTION,
- THE COLLEGE CAMPUS RUNS THE STABLES RESTAURANT WHICH IS OPEN TO THE PUBLIC,
- THE PROPOSED COLLEGE DEVELOPMENT INCLUDES PROPOSALS FOR A HYDROTHERAPY POOL.

The Director of Public Health at Hertfordshire County Council has written to explain that this would be of great benefit to the community and serve an important local need. There are a number of students at the college with severe and complex learning difficulties, requiring daily therapeutic input. This facility would also benefit the wider community and could potentially be offered alongside other sporting facilities and therapies.

















■ DLA **ARCHITECTURE**

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COMMUNITY & EDUCATION BENEFITS SPORTS FACILITIES:

• Improved public access to College Sports facilities and the possibility for growth in this area to meet local Community needs, including a new

THE DEVELOPMENT PROVIDES THE FOLLOWING SPORTS FACILITIES:

- A NEW & IMPROVED EQUINE CENTRE,
- A PURPOSE BUILT SPORTS PAVILION & CHANGING ROOMS
- GYM FACILITIES,
- THE HOME TO ST. ALBANS' HOCKEY TEAM, INCLUDING CLUB THEIR HOUSE & BAR,
- MULTI-USE SPORTS HALL,
- FULL SIZE & 5 A-SIDE FOOTBALL & RUGBY PITCHES.
- A NEW JOGGING ROUTE AROUND THE CAMPUS,
- THE FUNDING FOR A NEW 3G PITCH

















DLA ARCHITECTURE

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THE NEED FOR A NEW COLLEGE CAMPUS THE EXISTING COLLEGE CAMPUS

- The College Campus is not performing well in terms of teaching space. Maintenance and running costs are very high and the College's ability to be flexible and meet the changing needs of the curriculum is severely limited.
- Agricultural and animal buildings are now used for teaching with no adaptions to the space.
- Two main teaching blocks were originally built as residential accommodation and are therefore badly configured and very inefficient for teaching.
- The Mansion House is in need of modernisation, significant repair and also major works to deal with accessibility issues.



(A) Student Housing



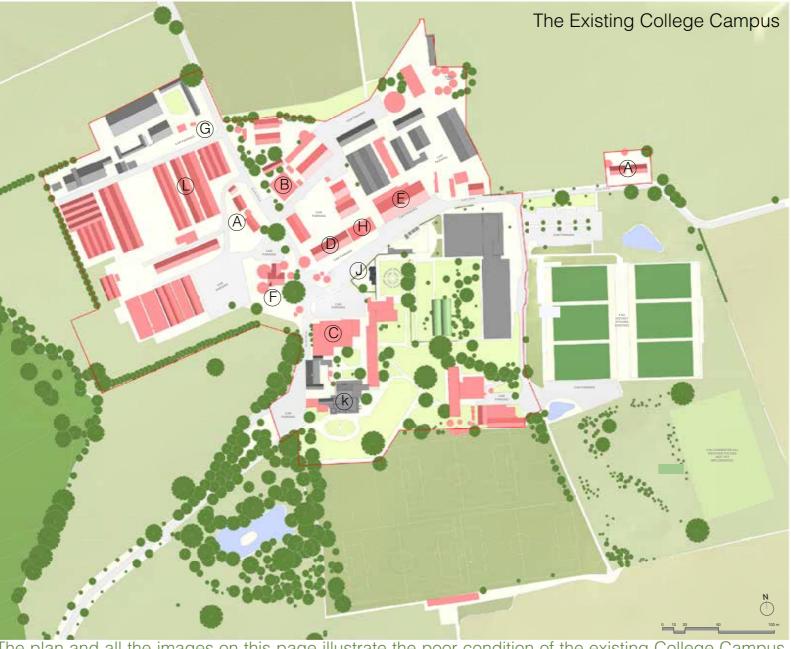
(B) General Teaching Portacabin



© The Entrance & Library Building

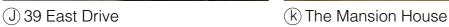


© Construction & Engineering



The plan and all the images on this page illustrate the poor condition of the existing College Campus. The red shaded buildings are the existing buildings which are due to be demolished as part of the new







(L) The Glasshouses



(E) Existing Changing Facilities



(F) Children's Nursery



© Equestrian Centre



(H) Engineering Workshop



COMMUNITY & EDUCATION BENEFITS THE PROPOSED COLLEGE MASTERPLAN

- Oaklands College Masterplan seeks to combine innovative architectural design, a sympathetic understanding of the Green Belt and the agricultural heritage of Oaklands.
- The Masterplan provides a College green at the centre of the site together with the removal of the poor quality buildings and traffic from the heart of the campus.



A The Homestead Student Housing



(B) General Teaching Building



© The Entrance & Library Building



© Construction & Engineering

A Summary of the Proposed Education and Community Buildings:









(L) The recently completed Discovery Centre



(E) Sports & Changing Pavilion



F Children's Nursery



(G) Equestrian Centre



(H) Engineering Workshop

Key to Campus Plan





COMMUNITY & EDUCATION BENEFITS THE PROPOSED COLLEGE MASTERPLAN

• The redevelopment of the college site will provide significant improvements for the students, staff and the local Community.





THE COLLEGE SQUARE & NEW GATEWAY BUILDING:

- WILL PROVIDE A CLEAR FOCUS & ENTRANCE TO THE CAMPUS,
- THE GATEWAY WILL BE THE COLLEGE'S MAIN RECEPTION,
- STUDENT ONE-STOP-SHOP ADVICE & GUIDANCE,
- THE PLACE FOR STUDENT LEARNING OUTSIDE THE CLASSROOM IN THE LEARNING RESOURCE CENTRE,
- STUDENT SERVICES CAFE AND THE STUDENT LOUNGE,
- PUTTING ADMINISTRATION SERVICES AT THE HEART OF STUDENTS ACTIVITY.

THE NEW GENERAL TEACHING BUILDING PROVIDES:

- NEW SCIENCE LABORATORIES,
- FLEXIBLE TEACHING AND LEARNING SPACES FOR A RANGE OF VOCATIONAL AND A- LEVEL COURSES,
- SPECIALIST FACILITIES FOR STUDENTS ON LEARNING FOR LIVING AND WORK PROGRAMMES.

COMMUNITY & EDUCATION BENEFITS THE PROPOSED COLLEGE MASTERPLAN

 The College has taken care in formulating the proposals, to minimise any impacts on the openness of the Green Belt as far as possible. The proposed College buildings have been focused within existing developed parts of the



THE NEW CONSTRUCTION & ENGINEERING WORKSHOP WILL PROVIDE:

- MODERN INDUSTRY STANDARD WORKSHOPS FOR THE TEACHING OF PAINTING AND DECORATING, ELECTRICAL INSTALLATION AND PLASTERING.
- THE BUILDING ITSELF IS INTENDED TO BE A TEACHING TOOL FOR STUDENTS WITH THE BUILDING MANAGEMENT TECHNOLOGY MADE VISIBLE.



THE HOMESTEAD - NEW STUDENT RESIDENCE:

- THE RESIDENTIAL ACCOMMODATION FOR STUDENTS IS LOCATED IN AN 80 BEDROOM "HOMESTEAD".
- THE PROVISION INCLUDES EN SUITE ACCOMMODATION AND SOCIAL SPACES.
- THIS LOW RISE DEVELOPMENT TO THE WEST OF THE SITE IMPROVES THE CURRENT DISPERSED RESIDENCES WHICH ARE NOT DESIGNED FOR SPECIFIC STUDENT NEEDS.

COMMUNITY & EDUCATION BENEFITS THE COLLEGE MASTERPLAN DESIGN APPROACH

ENHANCING THE EXISTING CHARACTER OF OAKI ANDS:

The retention, protection and enhancement of existing key elements across the site which have historically informed the character of the Oaklands Campus:

- TREE LINED APPROACH
- THE MANSION HOUSE AND STABLE BLOCK
- LANDSCAPING:

The natural landscape, walled Gardens, outdoor teaching spaces, agricultural areas

- THE 'AGRICULTURAL' ARCHITECTURE VERNACULAR
- THE GREAT OAK
- FOCAL POINTS & SIGHT LINES



The Mansion House above within the historic landscape of the College Campus.

PROPOSED MATERIALS:

The proposed materials include bricks to compliment and enhance the existing bricks on site.

Contemporary, high quality materials such as zinc and terracotta have been used in a way to make reference to the traditional black timber cladding of the original agricultural buildings.

Inspiration has been taken from the existing textures and colours on the site and reinterpreted where possible to reflect the existing character of the campus.

















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CHARACTER ZONES & COLLEGE CAMPUS AS VILLAGE:

- NATURAL GROUPINGS OF DEPARTMENT BUILDINGS.
- DEMOLITION OF EXISTING BUILDINGS IF NECESSARY & RETENSION & REFURBISHMENT IF POSSIBLE.
- RETENTION OF EXISTING BUILDINGS, APPROPRIATENESS TO FUNCTION, PEDESTRIAN MOVEMENT AND BUDGETARY CONSTRAINTS.
- THE CHARACTER ZONES ORGANISE THE CAMPUS EFFICIENTLY AND ENABLE DISTINCTIVE IDENTITIES TO BE DEFINED FOR THE INDIVIDUAL COLLEGE DEPARTMENTS WITHIN THE OVERALL CAMPUS.



The concept of the Campus as Village offered a structural device which assisted when developing the layout of the buildings on the site:

- MANOR HOUSE RETAINED AS A HERITAGE ASSET
- 'VILLAGE CHURCH' AS LANDMARK ENTRANCE BUILDING
- FARMSTEAD AS STUDENT 'HOMESTEAD' RESIDENTIAL
- VILLAGE GREEN AS COLLEGE SQUARE AND THE FOCUS AROUND WHICH ALL BUILDINGS AND ACTIVITIES CLUSTER ARCHITECTURE





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COMMUNITY & EDUCATION BENEFITS MINIMISING IMPACT WITH THE GREEN BELT

IMPROVING THE GREEN BELT

The College Masterplan provides a much needed opportunity to improve the Green Belt by sensitively improving the visual impact of this part of the site.

Following the building condition and site survey the buildings within area (B), in the image to the right, were identified for demolition. Budgertary constraints meant the majority of the buildings in area (A) would have to be retained and refurbished.

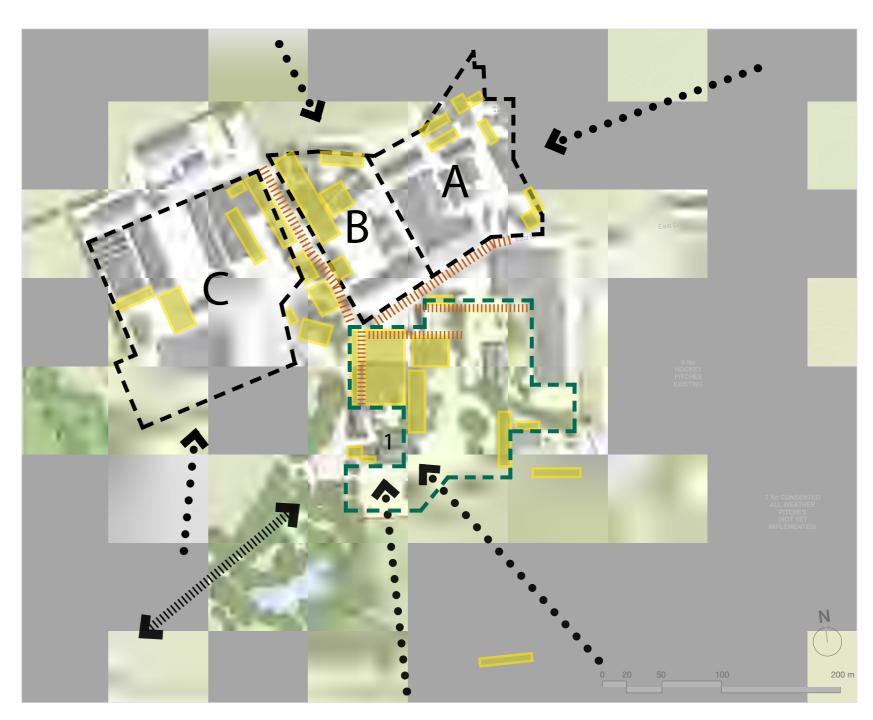
Area (C), left, illustrates the derelict glass houses which also cause a negative impact to the Green Belt. During the Masterplan development this area was considered for an early construction phase

CONTROLLED VIEWS

It was understood through the site analysis that a controlled sequence of views upon approach to the site would frame key views, create focal points and assist in creating a sense of containment, whilst reducing the visual impact from the surrounding area. (the black dotted arrows right indicate the key views)

INCREASING THE GREEN LANDSCAPE

The Masterplan aims to increase the amount of green landscaping across the campus by creating a College square and quad at the heart of the site. The connections across the entire site would be fused through green landscaping thereby enhancing the Green Belt (this is illustrated by the green dashed line on the plan to the right and the yellow areas showing proposed green landscaping)



The Campus plan above illustrates the northern edge of the site which currently has a negative visual impact on the Green Belt due to the proliferation of poor quality buildings. The Masterplan aims to greatly improve this area of Green Belt and the education provision of the College.







DELIVERY TIMETABLE & PHASING

DELIVERY & PHASING

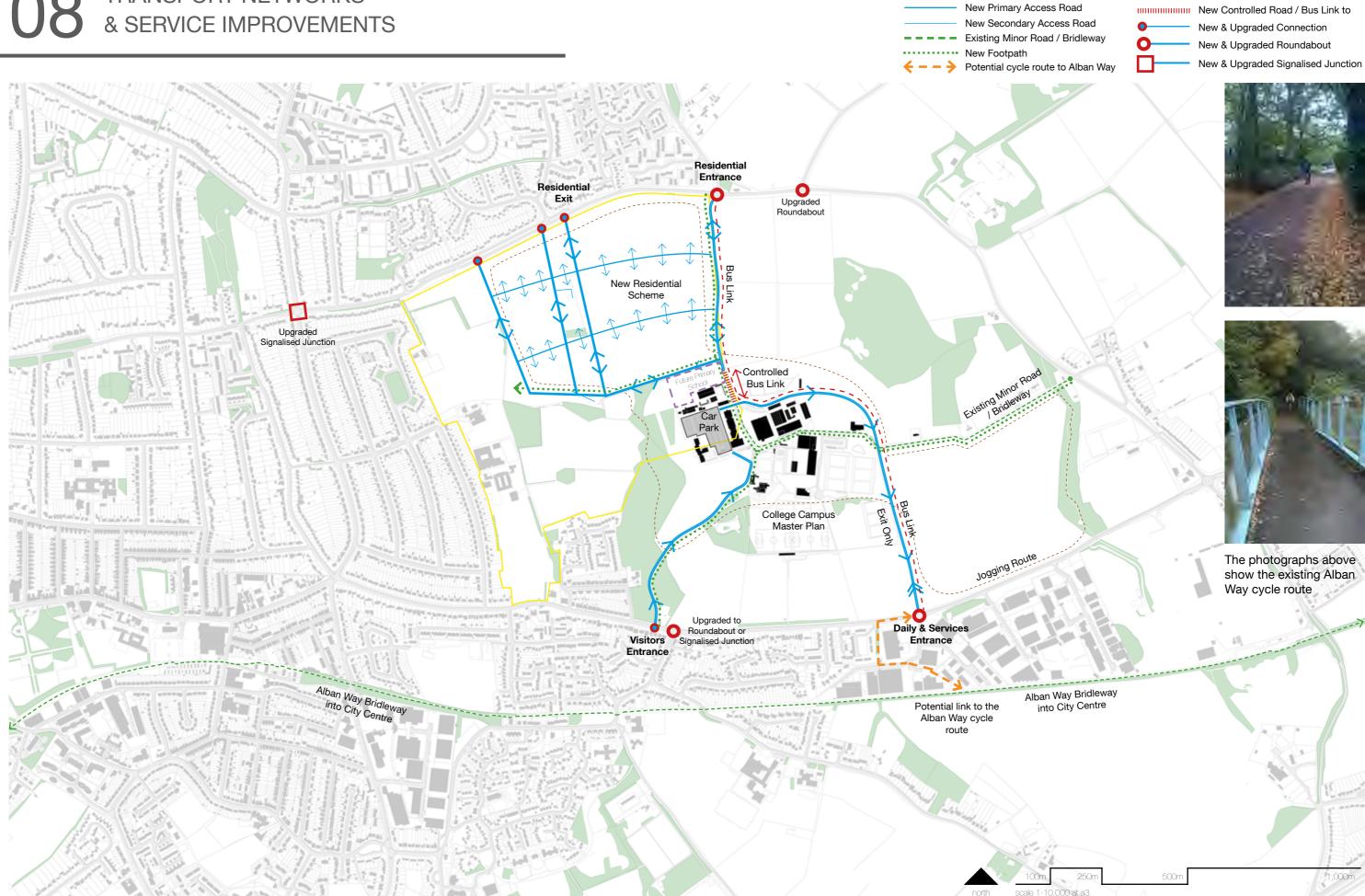
- THE SITE PERFORMS PARTICULARLY WELL IN TERMS OF DELIVERABILITY, AS IT IS ALL WITHIN ONE OWNERSHIP AND A DEVELOPMENT PARTNER ALREADY EXISTS FOR THE FIRST PHASE.
- IT IS ENVISAGED THAT IN THE ORDER OF 100 DWELLINGS PER ANNUM COULD BE DELIVERED.
- INFRASTRUCTURE WOULD BE DELIVERED EARLY ON IN THE MASTERPLAN DELIVERY PROCESS. THIS IS IMPORTANT IN RELATION TO TRANSPORT FOR EXAMPLE,
- HERTFORDSHIRE COUNTY COUNCIL WOULD BE CONSULTED ON THE OPTIMUM TIME TO PROVIDE THE NEW 2FE PRIMARY SCHOOL TO ENSURE IT MEETS WITH THE NECESSARY NEEDS.
- THE PERMITTED 348 HOUSES ARE BEING DELIVERED BY THE COLLEGE'S EXISTING PARTNER TAYLOR WIMPEY AND THE COLLEGE WILL BE SEEKING DEVELOPMENT PARTNERS TO REALISE THE VISION FOR THE PROPOSED 652 HOUSES
- THE COLLEGE WOULD USE THE SALE CONTRACT TO ENSURE THAT THE APPOINTED DEVELOPMENT PARTNER DELIVERS THE BENEFITS THAT HAVE BEEN AGREED.
- PLANNING POLICIES AND THE PLANNING APPLICATION CAN ALSO ENSURE THE AGREED BENEFITS ARE DELIVERED.







TRANSPORT NETWORKS



Potential Green Belt Release Land

New Main Road

New Jogging Route

Bus Link

DIAGRAM KEY:

TRANSPORT NETWORKS & SERVICE IMPROVEMENTS

THE BENEFITS OF THE PROPOSED TRANSPORT AND SERVICE IMPROVEMENTS INCLUDE:

- REDUCED TRAFFIC PROBLEMS AT THE JUNCTION OF SOUTH DRIVE / HATFIELD ROAD / COLNEY HEATH LANE
- A FREQUENT BUS SERVICE ACCESSING THE COLLEGE & RESIDENTIAL DEVELOPMENT.
- BUS SERVICE DRECTLY SERVING THE COLLEGE, REMOVING THE NEED FOR STUDENTS TO WALK TO AND CONGREGATE ON HATIFLED ROAD AND AVOIDING DELAYS ASSOCIATED WITH BUSES PULLING IN / OUT
- LESS PRESSURE ON HATFIELD ROAD AS STAFF ACCOMMODATION WITHIN RESIDENTIAL DEVELOPMENT

THE EXISTING COLLEGE ENTRANCE: HATFIELD ROAD / COLNEY HEATH LANE:

- OPTION 1:
- NEW 3 ARM ROUNDABOUT
- ACCESS ONLY THEREBY SOLVING EXIT ISSUES



- OPTION 2:
- NEW SIGNALISED JUNCTION
- ACCESS ONLY THEREBY SOLVING EXIT ISSUES

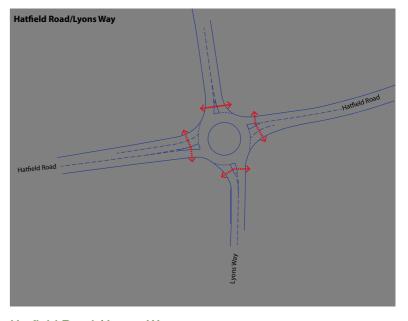


Hatfield Road / Colney Heath Lane

We have prepared two options for this junction. The first option shows the existing priority T-junction arrangement replaced by a 3 arm roundabout. This layout is consistent with the scheme agreed for the Hub scheme, so has previously been seen and approved by Hertfordshire. The second option shows the existing priority T-junction converted to a signalised junction. We did look at this as part of the Phase 2 application but couldn't get it to work due to the interaction with South Way. However, in both options we have assumed that South Way becomes entry only, therefore the signalised option may be worthy of further investigation as it requires significantly less land and allows pedestrian crossing facilities to be integrated into the junction.

NEW COLLEGE ENTRANCE / EXIT: HATFIELD ROAD / LYONS WAY:

- NEW MAIN ENTRANCE / EXIT TO THE COLLEGE
- RELIEVING TRAFFIC PRESSURE
- PREVIOUSLY AGREED BY HIGHWAYS



Hatfield Road / Lyons Way

We have prepared an option showing the existing priority T-junction arrangement replaced by a 4-arm roundabout, with the northern arm serving as the new access to the College from Hatfield Road. Again, this layout is consistent with the scheme agreed for the Hub scheme, so has previously been seen and approved by Hertfordshire.







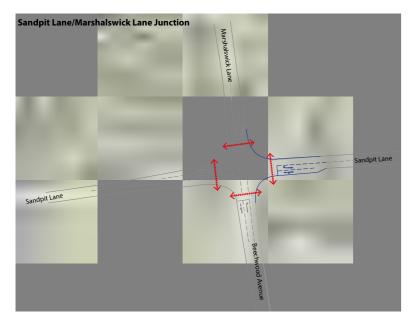
TRANSPORT NETWORKS & SERVICE IMPROVEMENTS

THE BENEFITS OF THE PROPOSED TRANSPORT AND SERVICE IMPROVEMENTS INCLUDE:

- INCREASED CAPACITY AT COOPERS GREEN AND SANDPIT LANE/MARSHALSWICK LANE
- SAFETY IMPROVEMENTS UNDERTAKEN

SANDPIT LANE / MARSHALSWICK LANE:

- WIDEN THE EASTERN APPROACH
- RELIEVING THE PINCH POINTS
- ADVANCED CYCLE STOPS

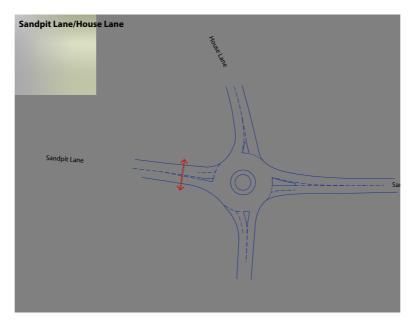


Sandpit Lane / Marshalswick Lane

Improvements are proposed at this junction as part of the Phase 2 application – these are shown in grey in the sketch. The only option we can see for further improvement to this junction is to widen the eastern approach by taking land from the verges to the north and south. The potential for two separate left hand turn lanes will be explored. Consideration could be given to introducing advanced cycle stop lines at this junction to encourage cycling.

NEW RESIDENTIAL ACCESS: SANDPIT LANE / HOUSE LANE:

- NEW 4 ARM ROUNDABOUT
- RESIDENTIAL ENTRANCE / EXIT

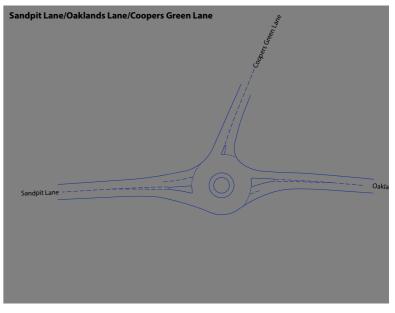


Sandpit Lane / House Lane

We have prepared an option showing the existing 3-arm roundabout replaced by a larger 4-arm roundabout, with the new southern arm serving as an access to the residential development

SANDPIT LANE / COOPERS GREEN LANE:

- ENLARGED 3 ARM ROUNDABOUT
- ADDITIONAL CAPACITY
- IMPROVED SAFETY



Sandpit Lane / Coopers Green Lane

We have shown an enlarged 3-arm roundabout, which would provide additional capacity and also improve the safety of the junction by increasing deflection which would slow approach speeds.









Summary

A summary of community benefits are as follows:

- The viability of the proposals have been verified to ensure the College are able to deliver the planning benefits detailed in this document.
- 42% affordable housing in line with the requirements of the local community, which offer truly affordable homes, including social rented home,
- A mix of high quality designed homes, in particular 2 bedroom and 3 bedroom homes helping to fill the gaps identified in the SHMA
- Self-build Code Level 6 experimental homes within the eastern portion of the masterplan, which would also be used as a teaching,
 tool for the College and St Albans residents,
- An exemplar high quality design masterplan that allows residents and the general public to access the parklands, the lake, existing and new footpaths, and cycle paths as well as the college restaurant, farm shop and community days centred on the new public square College Square as part of the current masterplan. This would include zero carbon for 650 of the proposed dwellings,
- A new two form entry Primary school able to link with other schools in the area but also with the college, enabling an exciting
 educational opportunity for the primary school children to access all the facilities the College has to offer,
- A Combined Heat and Power facility at the centre of the scheme and serving 650 of the dwellings,
- · Sustainable drainage integrated into the masterplan through swales and reed beds,
- Large areas of residential amenity space with wide habitat corridors, considerable numbers of new native trees planted,
- Comprehensive new road junction improvements including new junctions and access roads with the potential for a bus link through from Sandpit Lane to Hatfield Road,
- Improved public access to college sports facilities and the possibility for growth in this area to meet community need,
- And fundamentally all the money released through this site allocation will be invested in realising the potential of the communities served by Oaklands College.

Please Note: Oaklands College are happy for the proposals within this document to be incorporated into the Strategic Local Plan policy text.

St Albans Local Plan - Statement of Common Ground between St Albans City & District Council (SADC) and St Albans School and Woollams Trust; Hallam Land Management Ltd; and Hunston Properties Limited – North St Albans Broad Location (S6 vi)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC); St Albans School (the School) and the St Albans School Woollam Trust (Woollam Trust); Hallam Land Management Ltd; and Hunston Properties Limited in relation to the Local Plan Broad Location S6 (vi) – North St Albans. It concisely considers areas of agreement between the parties following the landowners' representations on the St Albans Draft Local Plan in order to confirm the soundness and robustness of the Broad Location. It is anticipated that further agreed detail may be available by the time of the commencement of the Local Plan Hearing session on 21 January 2020.

The agreed matters in this SOCG do not preclude any further written or verbal representations that the District Council and Hunston Properties Limited; Hallam Land Management Ltd and the School and the Woollam Trust may wish to make as part of the Local Plan Examination.

The School and Woollam Trust; Hallam Land Management Ltd; and Hunston Properties Limited are working collaboratively, cooperatively, proactively and productively with SADC and all relevant partners to bring the site forward for development as set out in Policy S6 (vi).

It is important to also consider alongside this document the signed Local Plan Developer / Site Promoter Response Proforma 2018 as set out at Appendix 1.

2. Legal Compliance; Duty to Co-operate and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

The parties consider that the Local Plan is legally compliant and consistent with national planning policy including the National Planning Policy Framework (2019). It is considered that St Albans City & District Council has fulfilled the Duty to Co-operate and that the Local Plan has been prepared in accordance with the timetable set out in the Local Development Scheme. Furthermore, it is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement and appropriate bodies have been consulted. A comprehensive and robust Sustainability Appraisal has also been carried out to support the Local Plan.

3. The Site

The site S6 vi) is shown on the Draft Local Plan Policies Map (CD003) and a map of the directly relevant area controlled/owned by St Albans School and the Woollam Trust; Hallam Land Management Ltd; and Hunston Properties Limited is given in Appendix 2.

4. Broad Location for Development

The parties for the site agree that Policy S6 (vi) is sound and robust in principle and evidence shows that all requirements including any need for leisure and playing fields can and will be delivered at the point in time currently envisaged in the Plan:

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 vi) - North St Albans Broad Location

Objective

To provide an urban extension of St Albans.

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with local communities, landowners and other stakeholders
- 2 Minimum capacity 1,100 dwellings
- The 1,100 dwelling figure above includes at least one 50+ bed C2 Residential or Nursing care home, at least one 50+ home C3 Flexi-care scheme and 12 units to provide special needs accommodation, in accordance with Policy L2
- 4 Minimum 40% Affordable Housing in accordance with Policy L3
- 5 Minimum overall net density 40 dwellings per hectare
- 6 Housing size, type and mix as set out in Policy L1 and Appendix 6
- 7 Minimum 10 essential local worker houses held in perpetuity for rent for local teachers
- 8 Strategic and local public open space, including managed woodland and ecological network links
- 9 Retention of important trees and landscape features
- 10 A 2FE primary school, including Early Years provision, to serve the new community
- 11 Transport network (including walking and cycling links) and public transport services upgrades/improvements, including off-site improvements to Harpenden Road, Sandridgebury Lane, Valley Road, Ancient Briton junction and King William IV junction
- 12 3% of homes provided to be self-build housing
- 13 New neighbourhood centre, including commercial development opportunities
- 14 Recreation space and other community facilities, including health provision
- 15 Community Management Organisation with sufficient assets to provide sustainable management of community facilities, open spaces and parklands
- 16 Excellence in design, energy efficiency and water management
- 17 Appropriate renewable energy production and supply mechanisms

5. Outstanding Matters

The following limited outstanding matters remains between the parties, in regard to Policy S6 (vi):

1.

6. Masterplanning and Delivery

The parties confirm their willingness to progress a timely planning application in order to meet (or come forward sooner than) the programme of completions in the Plan housing trajectory. The parties have agreed a Planning Performance Agreement (PPA) as set out at appendix 3. This PPA process is assisting in bringing forward the Broad Location in accordance with policy S6 (vi). Whilst still to undergo significant further iteration generally through the processes set out in the Strategic Sites Masterplanning Toolkit, including responding to public engagement, an indicative Masterplan can be seen at Appendix 4.

7. Appendices

Local Plan Developer / Site Promoter Response Proforma

- 2. A plan of the directly relevant area controlled/owned by Hunston Properties Limited; Hallam Land Management Ltd and St Albans School and the Woollam Trust
- 3. Agreed PPA
- 4. Indicative masterplan

Signatories:



Signed: Dated: 13th December 2019

On behalf of Hunston Properties Limited; Hallam Land Management Ltd and St Albans School and Woollams Trust



Chris Briggs
Spatial Planning Manager
St Albans City and District Council

Broad Location(s):	Site S6 (vi) – North St Albans				
Developer / Promoter:	Hallam Land Management Limited and Hunston				

1. The draft Broad Location is 'available' There are no issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc.	Yes	No overriding constraints. The two landowners St Albans School and The Trustees of James Henry Frank Sewell (Deceased) (represented by Hunston Properties Limited) are working in collaboration.
2. The draft Broad Location is 'Deliverable / Achievable' There is a reasonable prospect that the development, including all key aspects being assessed as part of the overall 'package' proposed, is viable and deliverable	Yes	The development is viable and deliverable
3. The relevant draft Local Plan Policy requirements are acceptable and achievable This includes specifically Policies L1 Housing Size, Type, Mix and Density; L2 Provision of Older Persons Housing and Special Needs Housing; and L3 - Provision of and Financial Contributions towards Affordable Housing (including specified mix of 'social rent', 'affordable rent' and 'subsidised home ownership') This also includes the matrix in Appendix 1 for Housing Mix / Tenure	Yes	
4. The relevant draft Broad Location policy requirements (S6 – individual Broad Location as applicable) are acceptable and achievable.	Yes	
5. The relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) are acceptable and achievable	Yes	
6. The 'deliverable / achievable' community benefits (of all relevant kinds) to help the Council in consideration of 'exceptional circumstances', including any 'additionality' or 'beyond standard' elements, are considered to be (listed in brief, no specific limit on number):	Our Vision is to create a vibrant and enduring new neighbourhood for St Albans' which will include: 1.Specialist Housing Provision An 80 bed Care Home and a minimum of 50 bed Flexi Care Scheme. A commitment to deliver 40% Affordable Housing to meet identified local needs including significant key worker provision for those employed locally in education within St Albans, which is a major issue for all schools in the area. These	

homes for local teachers will be managed by the School acting akin to a Registered Social Landlord, with their tenures controlled to ensure that these homes are retained as such in perpetuity.

The provision of **Self-Build plots** for those on the self-build register.

2.Economic

The provision of a new State Primary School, sponsored by St Albans School on 2.4ha of land – thereby ensuring early delivery and with the support and direct access to additional specialist skills and expertise within St Albans School.

A **Business hub** within the Local Centre with the potential to include office space, meeting rooms and a virtual office service.

Superfast Broadband throughout. Improved access to Porters Wood Industrial Estate, which will improve the attractiveness of the Estate and enhance the residential amenity of those who live on Valley Road. The implementation of an

Employment Skills Plan dedicated to improving job opportunities for the local labour market through this development; including setting up apprenticeships and offering skills training

3.Community

A new Local Centre and Community Hub on 1.2ha of land with flexible accommodation to be able to address changes in the community, including a hall and meetings rooms for residents' groups/youth groups/local societies, potential treatment rooms for visiting GP / health professionals for existing and new residents alike.

4.Transport and Infrastructure
A new Gateway into St Albans
Improvements to the Ancient Briton
and The King William IV junctions
as part of a coordinated strategy for
the wider area.

The realignment of Sandridgebury Lane.

Improvements to Valley Road and access to the Porters Wood Industrial Estate.

5.Recreation and Green Space
Readily accessible links to
Heartwood Forest and the Green
Ring initiative along with
improvements to local bridleways,
cycleways and footpaths including
National Route 6.

Diverse and generous, interconnected, green spaces in the form of parks, allotments, greenways, woodland belts, play spaces, footpath and cycle connections.

A commitment to provide a minimum of 18.5ha of Green Infrastructure: some 10ha over and above the adopted policy requirement to specifically address identified deficiencies highlighted in the Greenspace Strategy November 2011 at New Greens and the areas around Porters Wood.

Work collaboratively with the County Council and District Council to redefine the present route of Sandridgebury Lane to create a bridleway akin to Jersey Lane. Biodiversity enhancements

6.Community Governance

The establishment of a "self-financing" Community Land Trust to manage and maintain the open space and tenanted commercial development, with representation on the Board from St Albans School. A contribution of £175 per market home towards the funding of a "Community Project Worker": - a suitably qualified and experienced person employed to assist in the establishment of a successful and cohesive new local community and promote integration with the existing community.

To forge Partnerships with local organisations such as the Museum and Galleries Trust in commissioning Public Art and Earthworks St Albans.

7.Legacy and Heritage

St Albans School is an educational charity and has been in existence in the centre of St Albans since about 948 AD. It is a not-for profit organisation which is subject to oversight by the Charity Commission and consequently the Council has a quarantee that the capital receipts generated by this scheme for the School will remain in St Albans and will be directed towards securing the betterment of the wider society and community. The School will remain a key stakeholder and significant employer within the City with a vested interest in "doing the right thing". The decisions on how best to reinvest the capital receipt will be made at the time, but these funds will be used to provide the opportunity for:

- Increased bursary funding for talented local children who would be unable attend the school for financial reasons:
- Maintenance of facilities and future investment: and
- The maintenance of the School's historic environment within the City including renovation and preservation of the iconic Abbey Gateway, a Scheduled Ancient Monument and an iconic building within St Albans both to the local community and to the visitor economy.

The School will always be part of the community of St Albans and has an ambition to continue its work to become more inclusive. Uniquely the School will remain a critical friend and neighbour of the proposed development, so will naturally be keen to provide a unique assurance of quality and long-term maintenance. The School will, if deemed appropriate, secure the expertise of the School's Architect (and Conserver of the Fabric at Westminster Abbey) Ptolemy Dean to critique the design and provide specialist input into Design Codes. This work will be on a

M6Q5 Appendix 2

÷	collaborative basis with the Council and other key stakeholders.
7. Any other important considerations which the Council should be aware of	None

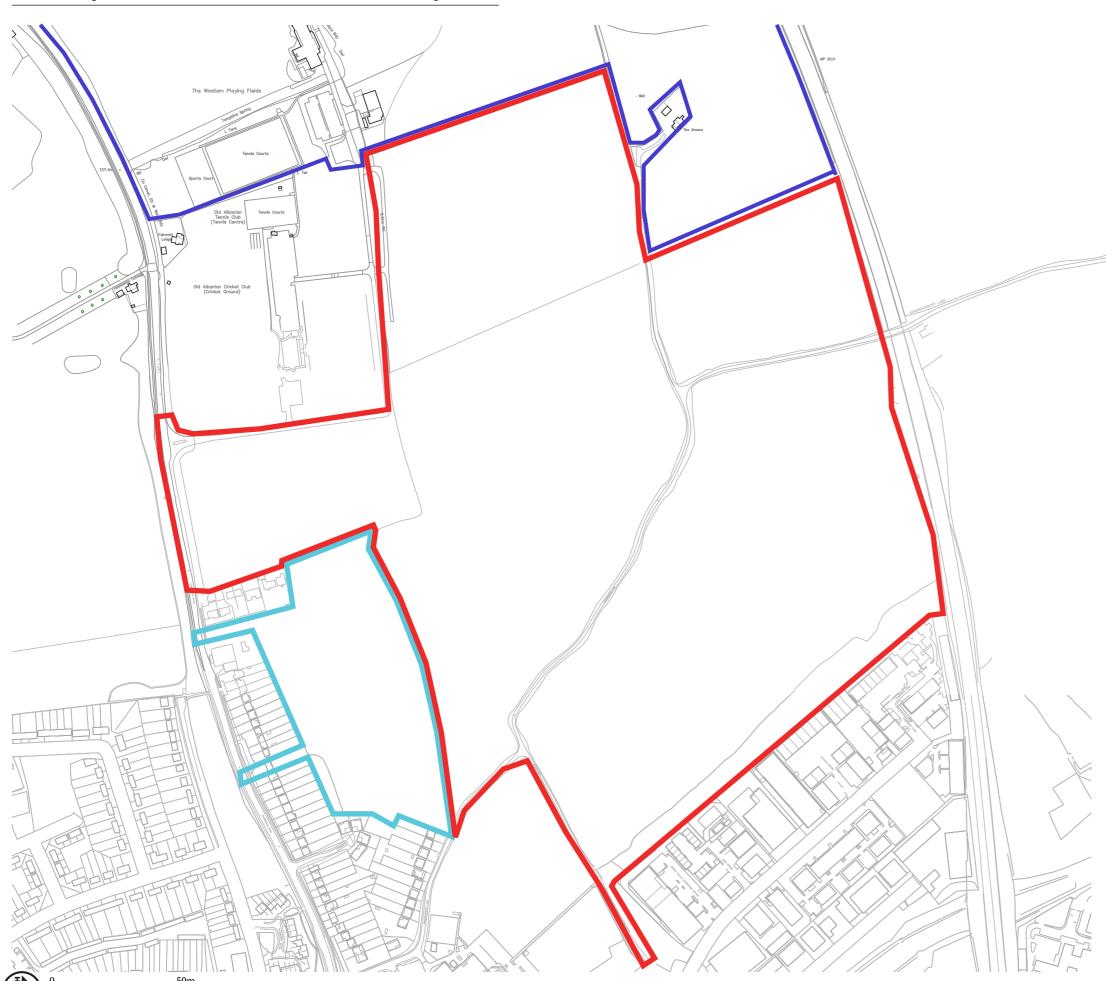
Signed:

On behalf of Hallam Land Management Limited

Dated: 31 May 2018

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M6Q5 Appendix 2 Development Site: Red Line Boundary



Legend

Development Site

 The St Albans School and the Woollam Trust; Hallam Land Management Ltd

Sewell TrustHunston Properties Ltd

Beyond the Development Site

Land Outside of the Development Site under St Albans School Ownership

Client: Hallam Land Management LTD Location: North St Albans / Title: Red Line Boundary Drawing No: 239 - P - 101 / Date: 11 /12/ 19

Drawn: CH / NE

PLANNING PERFORMANCE AGREEMENT ("PPA") North St Albans Broad Location, Harpenden Road, St Albans ("the Development")

This Planning Performance Agreement (PPA) is made on the 28th day of November 2019 between

- 1. St Albans City & District Council (SADC);
- 2. Hertfordshire County Council (HCC)

And the 'Applicants', comprising

- 3. Hallam Land Management Limited, St Albans School and St Albans School Woollam Trust and;
- 4. Hunston Properties Limited.

1. RECITALS

- 1.1 SADC is the local planning authority for development within the area in which the Development more particularly described in Schedule 1 is located.
- 1.2 HCC has prepared the Local Transport Plan and is the highway authority for the Hertfordshire Area and statutory consultee with responsibility for delivery of a range of services.
- 1.3 The Applicants have committed to work jointly with SADC and HCC to produce a masterplan for the Development, and further to that to submit Planning Application(s) for the Development to SADC.
- 1.4 The Applicants are to enter into discussions in relation to the masterplan and to enter into pre-application discussions with SADC and HCC regarding the Development.
- 1.5 The Planning Application or Applications will be for outline planning permission. The application(s) will be accompanied by such Application Documents (including those specified in Schedule 2) as are required by SADC Reference to the Planning Application(s) in this PPA is to the application(s) that are submitted to SADC by the Applicants and that SADC has registered on the statutory register as valid.
- 1.6 All parties wish to ensure that the Planning Application(s) is/are considered in a timely manner and as expeditiously as is practicable, having regard to the timetable set out in this PPA and compliance with relevant statutory procedures.
- 1.7 This PPA seeks to agree the requirements and timescales for the pre-application process and for the consideration and determination of the Planning Application(s) for the purpose of providing the parties with a level of certainty as to the process and timescale to be followed. In this PPA, the parties agree to extend the statutory determination period for the Planning Application(s) as set out in clause 2.2.

- 1.8 This PPA is made pursuant to Section 111 of the Local Government Act 1972, Section 2 of the Local Government Act 2000 and Section 93 of the Local Government Act 2003.
- 1.9 This PPA will not fetter SADC or HCC in exercising their statutory duties. It will not prejudice the outcome of the Planning Application(s) or the impartiality of SADC.
- 1.10 This PPA shall not restrict or inhibit the Applicants from exercising their right of appeal under Section 78 of the Town and Country Planning Act 1990.
- 1.11 The Applicants and SADC have agreed to enter into this PPA to cover both the pre-application and planning application stages. The fees chargeable under the terms of this Agreement relate solely to that part of the work that relates to the pre-application work and the additional work that falls outside the scope of the normal work required for the processing of applications pursuant to the relevant statutory fees. This PPA will ensure that determination of the Planning Application(s) is in accordance with a timeframe as agreed and acknowledged by all parties in advance, and will remove the application(s) from the normal statutory target for determination. The Applicants shall not seek to reclaim the statutory planning application fees paid to SADC, unless the planning application is not reported to committee for a decision within 6 months of the date of registration of the planning application.
- 1.12 Reasonable endeavours will be used to ensure that the parties meet the programme agreed. It is acknowledged that it may be necessary to review the programme at not less than monthly intervals during the application process.
- 1.13 In the event that an Applicant is dissatisfied with any part of the service provided by SADC, the Applicant shall in the first instance raise the concerns in writing to either SADC's Development Manager or Head of Planning and Building Control who shall seek to resolve the issues and if the issues cannot be resolved then the Applicant shall use SADC's internal complaints process.

2. TERMS AND OBJECTIVES

- 2.1 This PPA will apply from 28th November 2019 and shall remain in force until the Decision Date (as set out in Schedule 6) unless terminated earlier pursuant to clause 4.
- 2.2 The Parties agree to extend the statutory determination period for issuing the planning decision notices from 13 or 16 weeks (as relevant) to 25 weeks. The determination period is to begin with the date of validation of the respective Planning Application and include the signing of any Section 106 agreement that may be required. This PPA may be extended by agreement and a proforma is set out at Schedule 9.
- 2.3 Upon its expiry this PPA shall automatically terminate.

Objectives

2.4 The objectives of this PPA are to agree requirements and timescales (including pre-application meetings) and set out the main topics which need to be addressed by the Applicants on a masterplan and the subsequent submission of a planning

application or applications. All parties will work co-operatively and consistently throughout the pre-application discussions, negotiation and determination of the Planning Application(s), to the agreed timescales, so as to provide a degree of certainty for all involved.

- 2.5 In additional to the relevant local and national planning policy context, SADC discussions will be informed, as appropriate, by SADC's emerging Masterplanning Toolkit, which guides the collaborative masterplanning required by the draft Local Plan.
- 2.6 The parties agree to work together on a collaborative masterplanning process. It is acknowledged that following this, separate planning applications may come forward respecting the two land ownerships on the Development. It is accepted by the parties that these planning applications will need to respect the collaborative masterplanning process, and demonstrate compliance with the approved masterplan.
- 2.7 The main substantive topics agreed by all parties to be addressed prior to submitting a planning application are listed below, they offer a high level summary and are not an exhaustive list of all expected sub items:
 - 1. Character, Layout, Design and Appearance
 - 2. Access/Car Parking Provision
 - 3. Sustainable transport and movement
 - 4. Housing, including affordable housing
 - 5. Infrastructure in addition to transportation and including social infrastructure (education, health, community facilities)
 - 6. Local centre land uses, location, connections etc
 - 7. Green infrastructure Trees and Landscaping, including open space, amenity space and play space
 - 8. Ecology
 - 9. Flood Risk and Drainage
 - 10. Archaeology, Conservation and Heritage
 - 11. Neighbouring Amenity
 - 12. Energy and sustainability
 - 13. Community Engagement
 - 14. Other Matters, including matters pursuant to an Environmental Impact Assessment not separately listed above.

In addition, the Applicant will consider the need to provide digital connectivity at an appropriate time in the design and development process.

2.8 External consultees

SADC suggests that the following external consultees are key to be engaged with the proposals at pre-application stage:

- Environment Agency
- Historic Environment Unit (Archaeology)/ SADC's District Archaeologist
- Natural England
- Thames Water
- Health and Safety Executive
- Local residential and business community and key interest and user groups
- NHS

- Hertfordshire and Middlesex Wildlife Trust
- Hertfordshire County Council
 - Growth and Infrastructure Unit
 - Highways
 - Ecology
 - Countryside Access and Rights of Way
 - Lead Local Flood Authority
 - Education
 - Waste
 - Ecology
 - Fire and Rescue
 - Adult Care Services
 - Public Health

3. Amendment and Review

3.1 The PPA shall be subject to review as may be agreed between the parties and any agreed variation of its terms shall be evidenced in writing, signed by the parties using the template in Schedule 8.

4. Breach and Termination

- 4.1 Provided always that any breach is within the control of the party that is in breach, if any party considers that:
 - a. the circumstances that brought about this PPA no longer apply;
 - b. the principles and intentions of this PPA are not being followed; or
 - c. there is a material failure by another party to comply with the terms of this PPA;

It will draw their concerns to the attention of the other party. The other party will then have a period of not less than 10 working days within which to comment on and/or address the concerns. If the concerns are not addressed, the first party may then terminate the agreement at any point following the expiry of that period.

- 4.2 The PPA will also be terminated where:
 - a. the Applicant submits an appeal under Section 78 of the Town and Country Planning Act 1990 in relation to the Planning Application(s) (for whatever reason);
 - b. the Planning Application is called in by the Secretary of State. NB: in the event the planning application is called in by the Secretary of State the parties agree to establish an alternative joint arrangement as dictated by the circumstances at that time.

5. Joint Working

5.1 The Parties shall act with fairness and good faith in respect of all matters related to the pre-application(s) process and the handling of the Planning Application and will work jointly in complying with their respective obligations under this PPA. The Parties will establish a Project Team which will be responsible for progressing the Planning Application(s). The Project Team will include those individuals identified in Schedule 7 who will work together as much as possible cooperatively in accordance with the obligations below and with the performance standards set out in Schedules

3, 4 and 5.

Applicant's Obligations

- 5.2 Each Applicant agrees to use its reasonable endeavours to:
 - a. Work jointly with SADC on developing a masterplan for the site.
 - b. Participate in a Design Review Panel on at least two occasions (minimum of one at masterplanning stage and one at pre-application stage), unless otherwise agreed in writing;
 - c. submit the Planning Application(s) to SADC for the Development (set out in Schedule 1) by the Commencement Date (set out in Schedule 6);
 - d. submit such of the Application Documents (including those set out in Schedule
 2) as are required by SADC, in the format requested with the Planning Application when they are submitted;
 - e. comply with the Performance Standards set out in Schedule 3;
 - f. comply with the Performance Deadlines set out in Schedule 6; and
 - g. designate the Applicant's Project Team lead person and other team members as identified in Schedule 7. The designated lead person and others as required will attend all pre-application and Project Team meetings.

SADC and HCC's Obligations

- 5.3 In addition to their statutory obligations SADC and HCC agree to use their reasonable endeavours to:
 - a. work cooperatively in progressing the masterplan and Planning Application(s) and comply with their respective obligations under this PPA
 - b. designate a Project Team lead officer and other officers as identified in Schedule 7. The designated lead officer and others as required will attend all pre-application and Project Team meetings and shall be responsible for overseeing and carrying out the functions in accordance with this PPA;
 - c. comply with the Performance Standards set out in Schedule 4 (SADC only); and
 - d. comply with the Performance Standards set out in Schedule 5 (HCC only)
 - e. comply with the Performance Deadlines set out in Schedule6.

6. Fees

6.1 In consideration of this PPA, and in addition to the application fees payable under the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) Regulations 2012 upon submission of the Planning Application, the Applicant agrees to pay:

(i) To SADC

(i) To SADC

Fees for the preparation of this PPA and pre-application meetings in accordance with SADC's schedule of charges as published at the date of this PPA. The relevant fees (excluding VAT) are as follows:

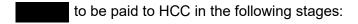
to be paid to SADC in equal installments of in the following stages:

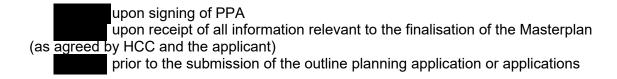
Payment 1: upon signing of this PPA

Payment 2: by 31st March 2020

Payment 3: prior to submission of the planning application or by 30th June 2019, whichever is the sooner.

- 6.2 (ii) To HCC
- 6.3 Fees for the preparation of this PPA and pre-application advice. For the avoidance of doubt the PPA fee replaces chargeable pre-application advice from HCC as Transport and the Lead Local Flood Authority. The relevant fees (excluding VAT) are as follows:





6.3 In the event that the programme becomes significantly protracted prior to application submission, and/or the number of meetings significantly increases, there may be a request for additional fees under a variation to this PPA as set out in clause 3 and Schedule 8

Procurement of external Services

- 6.4 The Applicants agree to pay for the procurement of the following services by SADC (subject to a brief for such services and the fee payable having been discussed with the Applicant(s) advance):
 - 6.4.1 A consultant to facilitate/provide public engagement services to SADC
 - 6.4.2 A consultant to provide services in relation to the energy and sustainability aspect of the proposed development
 - 6.4.3 A design review panel as required by the programme
 - 6.4.4 A consultant to provide services in respect of viability should this be required

7. Confidentiality

7.1 SADC and HCC are governed by the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 in how they handle the information that they hold. A summary of any viability information submitted must be provided in a form that can be made publicly available in the context of the decision making process.

SCHEDULE 7 The Project Team

Project team members – The Applicant

Role / Topic area	Name	Organisation	Email	Phone
Project lead	Owen Jones	LRM Planning		
Applicant	Iain Macsween Ed Saunders Jonathan Shreeves	Hallam Land Management Limited St Albans School Hunston Properties Limited		
Masterplanner	Nathan Edwards	Urban Wilderness		
Landscape	Steve Frazer	Urban Wilderness		
Highways	Rob Tams	WSP		
Community Engagement	ТВС			
Legal	ТВС			
Flood Risk/Water Resources	Dean Ward	WSP		
Ecology	David Harper	FPCR		
Cultural/Built Heritage	Rob Bourn	Orion Heritage		
Sports Consultancy	David O'Neil	Nortoft		

Project team members – St Albans City & District Council

M6Q5 Appendix 2

Role / Topic area	Name	E mail	Phone
Project lead / Case officer	Ruth Ambrose		
Design	Blazej Czuba		
Conservation and Listed Buildings	Ruth Mitchell		
Landscape and Trees	Maddy Gunn		
Housing	David Reavell		

Project team members- Hertfordshire County Council

Role / Topic area	Name	E mail	Phone
Project lead	Russell Monck		
Transport 1	Anthony Collier		
Transport 2	James Dale		
LLFA	John Rumble		
Ecology	Martin Hicks		

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Legend

Development Site BoundaryLand Outside of the Development Site underSt Albans School Ownership

Existing Woodland

Access

- • Combined Pedestrian & Cycle Links
- • Pedestrian Links
- (A) Harpenden Road: Signalised Junction
- B Harpenden Road: Priority Junction
- © Sandridgebury Lane: Closed to Though Traffic
- D Valley Road: Bus, Cycle and Pedestrian
- © Rail Bridge: Traffic calmed
- Foot / Cycle Links to Hertfordshire Way
- G Retained Access to Cheapside Farm
- H Emergency and Footpath Link to OA
- ① Emergency and Footpath Link Only

Green Infrastructure

Proposed Woodland

Indicative Specimen Tree Planting
Parkland

Community Growing Space

Community Orchard
Childrens Play Area

Teenage Play Area

Developemnt Area

Residential Development

Local Centre

Care and Retirement Living

Key Civic Space and Public Realm

Secondary Public Realm

- 1 Care Home
- 2 Assisted Living / Retirement
- 3 Local Food Outlet
- 4 2FE Primary School
- ⑤ Nursery
- 6 Local Shops and Flexible Work Space
- 7 Community Centre
- 8 Neighbourhood Growing and Play Areas
- 9 Primary SUDS Area
- 10 Potential Footpath Link to Porterswood [Explored by others]
- 11 Relocated Pitches

Client: Hallam Land Management LTD

Location: North St Albans / Title: Illustrative Framework Plan

Drawing No: 239 - P- 100 / Date: 11 /12/ 19

Drawn: CH / NE

St Albans Local Plan - Statement of Common Ground between St Albans City & District Council (SADC) and Crest Strategic Projects / Bloor Homes / The Ivory family / Trustees of M E Simons 1999 Discretionary Trust / Mr Wimms - North East Harpenden Broad Location (S6 vii)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC) and Crest Strategic Projects, Bloor Homes, the Ivory family, Trustees of M E Simons 1999 Discretionary Trust and Mr Wimms (the developers) in relation to the Local Plan Broad Location S6 (vii) – North East Harpenden. It concisely considers areas of agreement between the parties following the developers' representations on the St Albans Draft Local Plan in order to confirm the soundness and robustness of the Broad Location. It is anticipated that further agreed detail may be available by the time of the commencement of the Local Plan Hearing session on 21 January 2020.

The agreed matters in this SOCG do not preclude any further written or verbal representations that the District Council and the developers may wish to make as part of the Local Plan Examination.

The developers are working collaboratively, cooperatively, proactively and productively with SADC and all relevant partners to bring the site forward for development as set out in Policy S6 (vii).

It is important to also consider alongside this document the signed Local Plan Developer / Site Promoter Response Proforma 2018 as set out at appendix 1.

2. Legal Compliance; Duty to Co-operate and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

The parties consider that the Local Plan is legally compliant. It is considered that St Albans City & District Council has fulfilled the Duty to Co-operate and that the Local Plan has been prepared in accordance with the timetable set out in the Local Development Scheme. Furthermore, it is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement and appropriate bodies have been consulted. A comprehensive and robust Sustainability Appraisal has also been carried out to support the Local Plan.

3. The Site

The site S6 vii) is shown on the Draft Local Plan Policies Map (CD003) and a map of the directly relevant area controlled/owned by the developers is given in Appendix 2.

4. Broad Location for Development

The parties for the site agree that Policy S6 (vii) is sound and robust in principle and evidence shows that all requirements can and will be delivered at the point in time currently envisaged in the Plan:

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 vii) - North East Harpenden Broad Location

Objective

To provide an urban extension of Harpenden.

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with local communities, landowners and other stakeholders
- 2 Minimum capacity 760 dwellings
- 3 The 760 dwelling figure above includes at least one 50+ home C3 Flexi-care scheme and 10 units to provide special needs accommodation, in accordance with Policy L2
- 4 Minimum 40% Affordable Housing in accordance with Policy L3
- 5 Minimum overall net density 40 dwellings per hectare
- 6 Housing size, type and mix as set out in Policy L1 and Appendix 6.
- 7 Strategic and local public open space, including managed woodland and ecological network links
- 8 Retention of important trees and landscape features
- 9 Recreation space and public open space
- 10 A site for and appropriate contributions towards a 2 FE primary school, including Early Years provision
- 11 Transport network (including walking and cycling links) and public transport services upgrades/improvements
- 12 3% of homes provided to be self-build housing
- 13 Sufficient assets to provide sustainable management of community facilities, open spaces and parklands
- 14 Excellence in design, energy efficiency and water management
- 15 Appropriate renewable energy production and supply mechanisms

5. Masterplanning and Delivery

The parties confirm their willingness to progress a timely planning application in order to meet (or come forward sooner than) the programme of completions in the Plan housing trajectory. Whilst still to undergo significant further iteration generally through the processes set out in the Strategic Sites Masterplanning Toolkit, including responding to public engagement, an indicative Masterplan can be seen at Appendix 3.

6. Appendices

- 1. Local Plan Developer / Site Promoter Response Proforma
- A plan of the directly relevant area controlled/owned by Crest Strategic Projects / Bloor Homes / The Ivory family / Trustees of M E Simons 1999 Discretionary Trust / Mr Wimms
- 3. Indicative masterplan

Signatories:

Signed

Dated: 12/12/2019

On behalf of Crest Strategic Projects / Bloor Homes / The Ivory family / Trustees of M E Simons 1999 Discretionary Trust / Mr Wimms



Chris Briggs Spatial Planning Manager St Albans City and District Council

Broad Location(s):	Site S6 (vii) – North East of		
	Harpenden		
Developer / Promoter:	Crest Strategic Projects / Bloor		
	Homes		

Amended Annex 1 - Dated 14 June 2018

St Albans City and District Council

<u>Draft Local Plan Draft Strategic Site Selection Evaluation Outcomes</u> - Validation Panel

DEVELOPER / SITE PROMOTER RESPONSE PROFORMA - Annex 1

Following the Validation Panel discussions and your proforma response, please see further information to clarify SADC's evidential position at Appendix 1 and Appendix 2. Please confirm your position in respect of the following point:

Responses should be received by 5pm Wednesday 20 June 2018.

It should be noted that these proforma - annex 1 responses will be published in due course.

Broad Location(s): North-East Harpenden

Developer / Promoter: Crest Strategic Projects / Bloor Homes

3. The relevant draft Local Plan Policy	Yes	Any Commentary:	
requirements are acceptable and achievable			
This includes specifically Policies L1 Housing Size,			
Type, Mix and Density; L2 Provision of Older Persons			
Housing and Special Needs Housing; and L3 -			
Provision of and Financial Contributions towards			
Affordable Housing (including specified mix of 'social			
rent', 'affordable rent' and 'subsidised home			
ownership')			
This also includes the matrix in Appendix 1 for			
Housing Mix / Tenure	4		

Signed:

On behalf of: Crest Strategic Projects / Bloor Homes

Dated: 14/06/18

Introduction

This Note is submitted on behalf of Crest Strategic Projects and Bloor Homes and follows a meeting held with St Albans City and District Council (Local Plan Validation Panel) on 23 May 2018. The Note seeks to provide a response to the points raised in the Developer / Site Promoter Response Proforma form received from SACDC (24 May 2018). Responses are set out under the headings below.

1.0 Is the draft Broad Location "available"?

- 1.1 Yes. The site has been the subject of extensive representations (including to the "Call for Sites") submitted to SACDC dating back to 2014. It is therefore a long-established objective of Crest and Bloors as well as the current landowners to develop the site.
- 1.2 A Memorandum of Understanding between the parties has been confidentially submitted to SACDC and this demonstrates the close working relationship that the parties have and commitment to delivery in a comprehensive manner.
- 1.3 There are no known restrictions, legal covenants, etc. that would prevent development occurring on the site and therefore development is able to occur within the timescales as addressed below.

2.0 Is the draft Broad Location "deliverable / achievable"?

- 2.1 Yes. There are no infrastructure constraints at the site and development is able to come forward early in the Plan period and would involve two outlets (Crest and Bloors). The development of the site would be able to deliver in the region of 760No. dwellings as referred to in the Initial Officer Working Draft Local Plan policy S6 (vii).
- 2.2 Development could commence from 2022 and this would have regard to the timescale for adoption of the Local Plan (and thus Green Belt release), submission/approval of Outline/Full/Reserved Matters application(s), discharging conditions and potential for Section 106 Obligations to be dealt with.
- 2.3 The delivery schedule for the residential element is therefore set out below:

Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Total
Delivery (units)	50	80	80	80	80	80	80	80	80	70	760

- 2.4 Development of the site is also capable of delivering the overall package of benefits, referred to in draft Local Plan Policy S6 (vii). This would include:
 - 1) 50+ home Flexi-care scheme;
 - 2) Minimum 40% Affordable Housing;
 - 3) Density of 40 dwellings per hectare (subject to being in keeping with the character and appearance of the surrounding area);
 - 4) Housing size, type and mix as established through appropriate evidence base;
 - 5) Strategic and local public open space, including managed woodland and ecological network links:
 - 6) Retention of important trees and landscape features;
 - 7) Recreation space and public open space;
 - 8) A site for and <u>delivery</u> of 2FE primary school, including Early Years provision;
 - 9) Transport network and public transport services upgrades/improvements, where necessary;
 - 10) 3% Self/Custom-build housing;
 - 11) Sufficient assets to provide sustainable management of community facilities, open spaces and parklands;
 - High quality and inclusive design for all development, energy efficiency and water management; and
 - 13) Appropriate renewable energy production and supply mechanism.

- 2.5 At this early stage of the Local Plan process, it is considered that the above provides an appropriate mix of uses that would be viable for the site. Further details on this can be discussed with SACDC as the masterplanning process for the site evolves.
- 3.0 Are the relevant draft Local Plan Policy requirements acceptable and achievable?
- 3.1 **Policy L1 Housing Size, Type, Mix and Density** The objective of this policy is supported in-so-far-as it proposes all new housing development to contribute to a mix of different housing types.
- The policy refers to the provision of first-time buyer (1-2 bed) flats, first family homes (2-3 bed houses) and opportunities for downsizers as being particularly encouraged. This aspect is welcomed and the proposals for the site would be able to make provision in this regard.
- 3.3 This will however need to be assessed as against an appropriate updated evidence base and it is welcomed that the policy refers to this. In this context, the proposed Housing Mix Matrix (Appendix 1 to the Response Proforma) differs somewhat to the proposed housing mix for St Albans, as set out in the South-West Herts Strategic Housing Market Assessment (2016). It is noted that further work on the SHMA (Summer 2018) is being undertaken and we look forward to working with the Council to establish an appropriate mix of dwellings for the site, having regard to the evidence base.
- 3.4 Policy L2 Provision of Older Persons Housing and Special Needs Housing —
 The needs for and provision for appropriate accommodation for older people and those with special needs are recognised and the objectives of this policy are supported. The exact provision of homes/bed spaces can be secured in line with the evolving evidence base for the Local Plan.
- 3.5 The development proposals for the site are capable of delivering the proposed 50+ homes flexi-care scheme and this could help to meet the needs of older people as well as those with special needs.
- 3.6 Policy L3 Provision of and financial contributions towards Affordable Housing

 The broad objectives of this policy are supported and are considered to comply with
 National policy. The proposals for the site are capable of delivering the requisite 40%
 provision to help to meet local needs.
- 3.7 It is welcomed that the policy introduces flexibility in affordable provision having regard to economic / market viability considerations, however there is no explanation provided as to why such flexibility is not proposed to apply to the Broad Locations. Such sites may have to have regard to economic conditions / market indicators (no different to other windfall sites) at the time of a planning application and for such a policy to be "sound" it is considered that flexibility should also be afforded to the Broad Locations.
- 4.0 Are the relevant draft Broad Location policy requirements acceptable and achievable?
- 4.1 Yes. The proposed draft Broad Location policy requirements are acceptable. We do however suggest some minor amendments below.

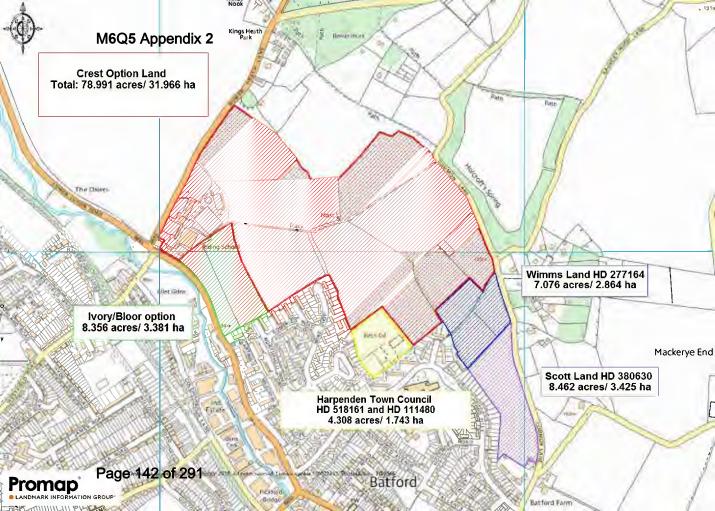
ter pulling

- a) It is considered that the masterplanning of the development should occur in collaboration with communities, landowners and other stakeholders, as stated, as well as with developers (omitted from the list).
- b) The proposed density of 40 dwellings per hectare is supported however it is considered that this should include a clause that this be in keeping with the character and appearance of the surrounding area.
- c) The proposed housing size, type and mix should be in accordance with and established through the evidence base for the Local Plan and it is noted that the SHMA is underway as scheduled for Summer 2018. We look forward to reviewing the contents of this assessment.
- d) The policy proposes a site for and appropriate contributions towards a 2FE primary school. Crest and Bloors develop and deliver primary schools as part of strategic development sites across the UK and are able to do so as well at this site. It is therefore recommended that the policy is re-worded to have regard to this.
- e) The objective of securing transport network and public transport services upgrades/improvements is supported. Such upgrades should however be necessary, directly related to the development and fairly and reasonably related in scale and kind to the development, in accordance with National policy and we look forward to addressing these aspects with SACDC and the County Highway Authority through the Local Plan process. This could include "soft transport measures" including enhancements to pedestrian and cycle links to the Town Centre.
- f) The Housing Trajectory included indicates that the development would commence in 2026/27. There are no infrastructure constraints at the site and development would be able to commence in 2022, as referred to above. This would help in meeting housing needs in the short-term, i.e. first five years of the Plan.
- 4.2 We trust that the above comments are helpful and we look forward to working with the Council on these aspects.
- 5.0 Are the relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) acceptable and achievable?
- 5.1 Yes. The Policy Map proposes that the north-west element of the site be retained as Green Belt. The Vision Document as submitted for the site (along with our representations to the "Local Plan Have Your Say" Consultation, March 2018) demonstrates that this area could retain its sense of openness and be provided as open space including for formal and informal recreation.
- 5.2 The masterplan proposals (detailed in the Vision Document) demonstrate a landscape-led vision for the site. This includes seeking to plan development around existing boundaries, hedgerows and landscape features. These aspects of the scheme would form a defensible boundary to the countryside beyond to the north.
- 6.0 The deliverable / achievable community benefits including any "additionality" or "beyond standard" elements.
- The proposed development secures a number community benefits (in addition to residential/affordable development). To reiterate, these include:
 - 50+ home Flexi-care scheme;
 - Significant and strategic public open space;

- A site for and delivery of 2FE primary school, including Early Years provision;
- Transport improvements including upgraded access arrangements at Lower Luton Road/B652 and other potential "soft transport measures";
- High quality design to be undertaken by established housebuilders and design to include innovative solutions including "modern terraces" and design codes for Self/Custom build.
- 6.2 In addition to the above, the proposed development is also able to secure:
 - Potential for GP provision (including potential links to Flexi-care scheme);
 - Flexible response to Local Centre including provision for shop/pharmacy provision, as well as potential for Community Hall/Sports pitch pavilion, if considered necessary this could be undertaken as part of the masterplanning process detailed in section 4 (a) above;
 - Significant employment opportunities including potential job opportunities for local people the Local Centre could include potential for serviced office space.
- 6.3 The above aspects of the scheme are considered to bring about an abundant range of community benefits, including social, economic and environmental, as addressed in the National Planning Policy Framework. In addition, it is noted that Crest and Bloors can deliver the school at the site, more than just provide the land and financial contributions towards this.

7.0 Any other important considerations / Conclusions

- 7.1 The Initial Officer Working Draft Local Plan is supported in broad terms it seeks to meet the intense level of housing needs at the least sensitive Green Belt locations (where alternatives do not exist), thus meeting the tests of "exception circumstances" set out in the NPPF.
- 7.2 It is acknowledged that the document forms a working draft at this stage and can be further advanced as the evidence base progresses including, *inter-alia*, the Strategic Housing Market Assessment and Transport Assessment.
- 7.3 In terms of soundness, we have sought to provide helpful commentary on some of the policies, including on content and wording. We trust these are helpful.
- 7.4 The site at North-East Harpenden performs very well in sustainability terms and the masterplan for the site demonstrates a landscape-led approach that could deliver c. 760 units at the site. This can also develop substantial community benefits including:
 - 50+ home Flexi-care;
 - Significant and strategic public open space;
 - A site for and delivery of 2FE primary school, including Early Years provision;
 - Transport improvements including upgraded access arrangements at Lower Luton Road/B652;
 - Potential for GP provision (including potential links to Flexi-care scheme);
 - Flexible approach to Local Centre inc. Shop/pharmacy provision; and
 - Potential for Community Hall/sports pitch pavilion, if considered necessary.
- 7.5 Having regard to the above information, the site is therefore "suitable", "available", "achievable" and thus "deliverable" in accordance with the NPPF. We look forward to continued dialogue with the Council including the potential for a further meeting to discuss the evolving proposals for the site.



Masterplan Context

5.2 Concept Design

A concept plan for how the Site could be developed has been generated, building on the work assessing the opportunities and constraints of the Site. The sketch provides a set of design principles that should be included within any layouts for the development of the Site:

- Potential access points off Lower Luton Road including potential redesign to the Lower Luton Road / Bower Heath Lane junction;
- Potential pedestrian and cycle access points into the Site, which link with the surrounding area (roads and footpaths) and also provide access to new potential new amenities provided within the Site;
- Internal street network designed as a 'hierarchy' of routes primary roads, secondary roads, tree lined residential streets, shared surface areas, private drives etc;
- Internal street network designed to acknowledge the ground level constraints of the western part of the Site;
- Integration of existing Public Rights of Way throughout development, and linking with new public open space to north of the Site;
- Potential location for new Local Centre ensuring good access with local community in Batford via Noke Shot
- Other uses such as new Primary School and Flexi-care development positioned around Local Centre to ensure higher level of footfall through the space;
- Integration of existing landscape & field boundaries to ensure green corridors are respected and features are made of the landscape setting;
- Potential locations for Sustainable Urban Drainage facilities (SUDs) such as attenuation basins and swales.





St Albans Local Plan Examination

Statement of Common Ground between St Albans City & District Council (SADC) and Legal & General Capital (L&G)

Matter 7: North West Harpenden Broad Location (S6 viii)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC) and Legal & General Capital (L&G) in relation to the Local Plan Broad Location S6 (viii) North West Harpenden.

It briefly confirms areas of agreement between the parties having regard to the principal soundness considerations. It is anticipated that an update to this SoCG will be available by the Local Plan Hearing session regarding this Broad Location on 11 February 2020.

The matters agreed in this SoCG do not preclude any further written or verbal representations that the District Council or L&G may wish to make as part of the Local Plan Examination.

L&G and SADC are working collaboratively with relevant stakeholders and delivery partners to bring forward the development of the North West Harpenden Broad Location site.

This SoCG should be read alongside the Local Plan Developer / Site Promoter Response Proforma prepared in May 2018 and attached at Appendix 1.

In summary, the parties consider that the draft Local Plan is, or is capable of being, legally compliant and sound.

2. The North West Harpenden Broad Location Site

The North West Harpenden Broad Location Site allocated under Local Plan Policy S6 (viii) is shown on the Draft Local Plan Policies Map (CD003). The majority of the site is owned and controlled by L&G as part of a wider land holding which extends beyond the Broad Location allocation.

The Inspectors will note that L&G's control of the site has increased since the position captured in the Proforma at Appendix 1 following the acquisition of CEG's interest in April 2019.

It is agreed that L&G's wider landholding provides opportunities for green space improvements and access for recreation in areas adjacent to the allocation which are currently proposed to remain within the Green Belt.

It is agreed that the North West Harpenden Broad Location site presents an opportunity for a sustainable, integrated and well-connected extension to the Harpenden urban area.

It is also agreed that there are no significant site-specific constraints to delivery.

3. Draft North West Harpenden Broad Location Policy

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 viii) - North West Harpenden Broad Location

Objective

To provide an urban extension of Harpenden.

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with local communities, landowners and other stakeholders
- 2 Minimum capacity 580 dwellings
- 3 The 580 dwelling figure above includes at least one 50+ home C3 Flexi-care scheme
- 4 Minimum 40% Affordable Housing in accordance with Policy L3
- 5 Minimum overall net density 40 dwellings per hectare
- 6 Housing size, type and mix as set out in Policy L1 and Appendix 6.
- 7 Retention of important trees and landscape features
- 8 Recreation space and public open space
- 9 A site for and appropriate contributions towards a 2 FE primary school including Early Years provision on a 2.5 ha site
- 10 Transport network (including walking and cycling links) and public transport services upgrades/improvements
- 11 Significant improvements to existing and/or new walking and cycling facilities to promote car-free access to Harpenden town centre, railway station and secondary schools
- 12 3% of homes provided to be self-build housing
- 13 Sufficient assets to provide sustainable management of community facilities, open spaces and parklands
- 14 Excellence in design, energy efficiency and water management
- 15 Appropriate renewable energy production and supply mechanisms

The parties agree that Policy S6 (viii) is, or is capable of being, sound and robust in principle. The matters which are not currently agreed are identified in Section 4.

The masterplanning process identified in Policy S6 began in August 2019 and is ongoing, as detailed in Section 5.

Both parties are agreed that a development which is consistent with the objectives and proposals set out in Policy S6 (viii) is capable of being delivered at the point in time currently envisaged in the Plan.

4. Matters Not Yet Agreed

The following principal matters relating to Policy S6 (viii) remain outstanding between the parties. In part, these matters are informed by the current position identified through detailed discussions within the masterplanning process.

- 1. Housing Size, Type and Mix (6). The Council's position is captured in draft Policy S6 (viii) (6) and other policies/elements of the Local Plan as referenced. L&G's position is that the final housing size, type and mix (including the nature of any self-build housing under (12)) should have regard to the most up to date market and housing need positions at the time of delivery.
- 2. Primary School Site (9). The need for additional primary education capacity is agreed. It is also agreed that the location north of Ambrose Lane is the preferred site for a primary school. The

Council's approach to meeting this need by providing an allocation for the required 2.5ha Primary School site within the Green Belt is not however agreed. SADC maintain that permission for the development of the school can be secured under Very Special Circumstances with the site remaining in the Green Belt. L&G's position is that, on the basis the need is known now, it would be preferable for the site to be released (at least in part for the built element of the provision) under exceptional circumstances by an allocation in the Local Plan.

3. Transport Improvements (10 and 11). In L&G's view, the detail and extent of any network and public transport improvements must be determined by up to date modelling and analysis.

Consistent with its original representation, L&G also reserves its position in relation to those matters and policy requirements which could be affected by elements of the evidence base which have not yet been subject to formal consultation, or which were not available at the time of the Regulation 19 consultation.

5. Masterplanning and Delivery

As requested in L&G's earlier representations, L&G and SADC 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.

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.

Whilst still to undergo further design development through the processes set out in the draft Strategic Sites Masterplanning Toolkit (July 2019), including responding to public engagement, an indicative Masterplan from the DRP which illustrates an output from the process so far is provided at Appendix 2.

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.

Progress to date with the masterplan process indicates that a planning application will be submitted and determined in a timely manner and the housing trajectory for North West Harpenden is therefore capable of being achieved if the Local Plan is adopted by the end of 2020.

6. Appendices

- 1. Local Plan Developer / Site Promoter Response Proforma
- 2. Indicative Masterplan

Signatories:

Signed:

On behalf of Legal & General Capital

Chris Briggs'
Spatial Planning Manager
St Albans City and District Council

Dated: 15.12.19

16.12.19

St Albans City and District Council

<u>Draft Local Plan Draft Strategic Site Selection Evaluation Outcomes</u> <u>– Validation Panel</u>

DEVELOPER / SITE PROMOTER RESPONSE PROFORMA

Following the Validation Panel discussions (see discussion agenda attached for reference – Appendix 2) and in relation specifically to the Policies and Policies Map set out in the indicative draft Local Plan presented to the Council's Planning Policy Committee on 22 May, please confirm your position in respect of the following points:

Your response should be brief / in note form and be comprehensible to an informed reader without additional reference material.

Your response should be no longer than 4 sides (including Appendix 1).

Responses should be received by 5pm Thursday 31 May 2018.

It should be noted that these proforma responses will be published in due course.

Broad Location(s): North West Harpenden (S6 viii)

Developer / Promoter: CEG and Legal & General Homes Communities

1. The draft Broad Location is 'available' There are no issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc.	Yes	Any Commentary: The land allocated for development is owned by L&G and Action for Children. CEG acts for Action for Children as site promoter. The sites are available now, can be accessed directly from the existing public highway and are close to existing infrastructure and utility networks.
2. The draft Broad Location is 'Deliverable / Achievable' There is a reasonable prospect that the development, including all key aspects being assessed as part of the overall 'package' proposed, is viable and deliverable	Yes	CEG is a master developer with a strong track record in delivering strategic developments with a business model which recognises and values high quality development. CEG is committed to the early delivery of new homes to meet local needs in Harpenden and the wider District. Legal & General Homes Communities is well placed to commit to the early delivery of homes and is committed to maximising social value and creating sustainable communities. CEG and L&G have been working on masterplanning for the site since 2014, with input from key stakeholders including the County Council (Education and Highways), SACDC, Statutory Undertakers/Utility Providers and Local Bus Operators. There is a reasonable prospect the residential-led urban extension at the North West Harpenden Location is viable and deliverable.
3. The relevant draft Local Plan Policy requirements are acceptable and achievable This includes specifically Policies L1 Housing Size,	Yes	It is understood the Initial Officer Working Draft Local Plan published for the Planning Policy Committee meeting on 22 May 2018 requires further work on the evidence base which will necessitate re-evaluation of the approach and strategy for housing development, and that consequently it should be considered as a working draft and will be subject to change / modification. (Officer Report on Item 11, Para 3.2).

Type, Mix and Density; L2
Provision of Older Persons
Housing and Special Needs
Housing; and L3 - Provision
of and Financial
Contributions towards
Affordable Housing
(including specified mix of
'social rent', 'affordable rent'
and 'subsidised home
ownership')
This also includes the matrix
in Appendix 1 for Housing
Mix / Tenure

CEG and L&G recognise the need for an evidence-based approach to ensure the range of housing needs are met.

Masterplanning work to date (as presented in the recent joint Vision document submitted as part of our Reg 18 consultation response and at the EVP Presentation) confirms that the North West Harpenden Location can accommodate a range of housing unit sizes, types and tenures, including a unit size mix which accords with the latest (2016) St Albans SHMA.

Once the evidence base has been updated, further masterplanning work will be required to confirm the site continues to be able to achieve a mix which meets up to date needs alongside the full range of other emerging policy requirements.

CEG and L&G recognise the affordable housing target of 40% is an important strategic target for the Council and are committed to providing a housing mix which supports a balanced community. Based on the current evidence (to be updated), the site is capable of delivering 40% Affordable Housing, with a mix of unit sizes, types and tenures to meet identified local needs. Aside from the overall quantum of affordable provision, both the unit tenure mix and the unit size mix need particular and careful consideration to ensure that overall the package successfully reflects the broad range of affordable housing requirements for the area.

The final tenure mix of affordable housing should seek to accommodate households who need social rented housing, affordable rented accommodation or assisted home ownership options such as shared ownership and shared equity. The final tenure mix will need to respond to the new/updated SHMA findings, local analysis of need, the prevailing waiting list and any particular pressures that identifies, as well as aligning with the provisions of national guidance and policy. CEG and L&G would welcome further discussions around the Council's current target tenure mix (in Policy L3) to ensure that the affordable provision contributes effectively to meeting the cross section of affordable needs.

The unit mix of any affordable housing coming forward on the site, like the tenure mix, must respond to, and meet the needs of a broad range of households. The evidence base including the emerging SHMA, the waiting list and local unit demand as informed by registered providers, should be considered together with the site characteristics to identify and prioritise the range of house types within the affordable package. Given the size of the site and the likely delivery timeframe there is also a need for flexibility to account for normal changes in demand which occur over that period.

This additional commentary on quantum, tenure and mix in respect of the affordable housing provision is intended to provide comfort and confidence that CEG and L&G are taking the delivery of affordable housing seriously in respect of this development opportunity. CEG and L&G recognise the need for the affordable housing mix to make genuine provision for the

4. The relevant draft Broad Location policy requirements (S6 – individual Broad Location as applicable) are acceptable and achievable.	Yes	identified need and to ensure provision matches wider Council priorities, to help first time buyers, younger families and older people looking to downsize in particular, and are committed to working with the Council to ensure the right housing mix is provided at the point of delivery. Development at the North West Harpenden Location is capable of accommodating the emerging draft policy requirements published in the Initial Officer Working Draft Local Plan (recognising the status of this document as set out in the Commentary for 3 above).
5. The relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) are acceptable and achievable	Yes	The extent of the North West Harpenden Location identified on the Policies Map is sufficient to accommodate the housing unit number set out in the emerging draft Local Plan with additional infrastructure including strategic green space and the 2.5ha primary school site location on adjacent land beyond the identified Broad Location area. The school site location is acceptable to HCC.
achievable' community benefits (of all relevant kinds) to help the Council in consideration of 'exceptional circumstances', including any 'additionality' or 'beyond standard' elements, are considered to be (listed in brief, no specific limit on number):	the sign and q thems alterar relation deliveral 1 Add acconduction 3 Add downs to stay 4 Mort teachers 5 Imp stock Additifacilit sustate housing benefit 1 Well and find 2 Spood 3 Investigation 1 Investigation 1 Well and find 2 Spood 3 Investigation 1 Investigation 1 Investigation 1 Investigation 1 Investigation 2 Investigation 1 Inv	the significant Green Belt constraints in St Albans District and gnificant local housing need and market pressures, the qualitative uantitative needs for additional housing in St Albans are, in selves, regarded as exceptional circumstances which justify an tion to the Green Belt boundary at North West Harpenden. In the to the community benefits directly associated with the ery of new homes, these are expected to include: itional family housing to improve access to suitable and affordable and at the same time release existing housing residents are affordable homes, including for essential local workers such as ers; roved affordability as a result of an increased level of housing across a range of tenures, including for first time buyers. Conally, the delivery of a full range of community ies/benefits alongside the new homes to promote inable patterns of development is regarded as related to the ng need based exceptional circumstances. These its/facilities comprise: I located site for 2 FE primary school, including a nursery facility, nancial contribution to delivery; rts pitches for school and wider community use; estment in improvements to local cycle and pedestrian routes will provide improved links for all through Harpenden as well as ger links between the development and the town centre/station;

4 Investment in local bus services, including road side infrastructure
which will provide improved facilities for new and existing residents and
promote sustainable travel patterns;

5 Financial contributions towards highway improvements in the town and the wider area, the exact location and scale of which are subject to further transport modelling to assess the location and scale of strategic development in the District;

6 New open spaces and green infrastructure, including orchard and allotments, which will be available to new and existing residents; 7 Investment in green links which will enhance the recreation and leisure use of the Green Belt beyond Harpenden to the north of the site. Following matters raised at the validation panel, L&G will explore the potential for the provision of further amenity space on land within their ownership;

8 Financial contribution towards a community building, the specification and location of which will be determined by future needs analysis and local consultation.

7. Any other important considerations which the Council should be aware of

Signed:

Legal & General address multiple housing needs through their group business functions, including homes for rent, affordable housing and purpose built later living, and as such are uniquely placed to assist in delivering a wide variety of housing types at North West Harpenden. The North West Harpenden Location is available for development in the short term and capable of making a significant contribution to the Council's 5 year Housing Land Supply provision.

CEG and L&G would be willing to apply for planning permission to demonstrate the suitability and deliverability of the site.

Charlotte Robinson

On behalf of: CEG (for Action for Children)

Dated: 31 May 2018

Appendix 1 - Housing Mix Matrix

Draft Local Plan - Appendix 6

Housing Mix, Tenure and Bedsize

James Lidgate
Legal & General Homes
Communities

Tenure	1 Bed	2 Bed	3 Bed	4+ Bed
Affordable Rent	14%	22%	57%	7%
Social Rent	14%	22%	57%	7%
Subsidised Home Ownership	14%	22%	57%	7%
Market Housing	14%	22%	57%	7%
All Sectors	14%	22%	57%	7%

Appendix 2 - Discussion Agenda (for reference)

<u>Draft Strategic Site Selection Evaluation Outcomes – Validation Panel</u>

The process is as agreed by the Planning Policy Committee in March and May 2018 as:

- 4.103 Developers of sites passing step 8 of the Evaluation Process be invited to present their schemes to an Evaluation Validation Panel of the Chair of PPC and up to three Councillors selected from PPC, on 23-24 May
- 4.13 As agreed at the March meeting of PPC, developers of the sites scoring an overall evaluation of Green or Amber will be invited to present their schemes. These presentations will be considered by an Evaluation Validation panel. This will comprise the Chair of PPC and up to 3 Councillors selected from PPC. This is due to take place on 23 May and 24 May 2018.

The format shall comprise:

Maximum 6 representatives

30 minute overall session

Initial presentation* (circa 15 minutes max) followed by Councillor Q and A

Key matters to address:

- 1 Draft Strategic Site Selection Stages 1-3 particularly availability, 'unique contributions', viability and deliverability
- 2 Draft Local Plan overall particularly 'social rent' affordable housing, high quality design, appropriate densities
- 3 Draft Local Plan Broad Location requirements

(* presentation methodology as representatives wish – projection facilities will be available – Powerpoints to be emailed to relevant SADC officers by 17.30 on the day before the relevant meeting date, for clearance and uploading)

[NB: - 'unique' now to be read as 'exceptional']

Appendix 3 - Draft Local Plan - Relevant Policies (extracts for ease of reference)

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must generally accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 viii) - North West Harpenden Broad Location

Objective

To provide an urban extension of Harpenden.

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with communities, landowners and other stakeholders
- 2 Minimum capacity 580 dwellings
- 3 The 580 dwelling figure above includes at least one 50+ home C3 Flexi-care scheme
- 4 Minimum 40% Affordable Housing in accordance with Policy L3
- 5 Minimum overall net density 40 dwellings per hectare
- 6 Housing size, type and mix as set out in Policy LXXX and Appendix 6.
- 7 Retention of important trees and landscape features
- 8 Recreation space and public open space
- 9 A site for and appropriate contributions towards a 2 FE primary school including Early Years provision on a 2.5 ha site
- 10 Transport network (including walking and cycling links) and public transport services upgrades/improvements
- 11 Significant improvements to existing and/or new walking and cycling facilities to promote car-free access to Harpenden town centre, railway station and secondary schools
- 12 3% of homes provided to be self-build housing
- 13 Sufficient assets to provide sustainable management of community facilities, open spaces and parklands
- 14 Excellence in design, energy efficiency and water management
- 15 Appropriate renewable energy production and supply mechanisms

Policy L1 - Housing Size, Type, Mix and Density

All new housing developments will contribute to a mix of different housing types. This includes directly addressing the evidence of local need, while taking into account the existing pattern of development in the area and site-specific factors.

Mix, type and size will be judged comprehensively and not just on bedroom numbers in isolation. Where necessary to ensure policy aims are achieved, this will include an assessment of overall dwelling size, proposed bedroom numbers and numbers of habitable 'non-bedroom' rooms.

Development at the Broad Locations is required to provide the specific locally needed mix of housing set out in Appendix 6 or as updated by SADC based on more recent housing needs evidence.

The provision of first-time buyer (1-2 bed) flats, first family homes (2-3 bed houses) and opportunities for downsizers are particularly encouraged.

The affordable housing size, type, and mix must broadly reflect that being provided for the market element of all development.

All new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area in which it is situated. Higher density development in accessible urban locations with good access to services will be supported.

Development proposals that fail to make efficient use of land for housing, having appropriate regard to local character and site-specific factors, will be refused permission.

In Broad Locations a minimum average net density of 40 dwellings per hectare is required.

Policy L2 – Provision of Older Persons Housing and Special Needs Housing

Needs for and provision of appropriate accommodation for older people and those with special needs are particularly complex and evolving areas. They are dependent on a combination of many changing things, including: underlying demographics; HCC and NHS funding and policy approaches; evolving types of both specialist and general accommodation; and locations of new housing.

Minimum levels of provision are required as follows (on the basis of no net loss of existing):

Older People

Residential Care, Nursing Care and similar (C2) – At least 500 bedspaces to be provided to 2036. This includes those required to be delivered on Broad Locations.

Flexi-Care and similar (C3) - At least 250 bedspaces to be provided to 2036. This includes those required to be delivered on Broad Locations.

Affordable Housing provision is required for older people's accommodation. This includes both C2 forms of housing and C3 forms of housing.

Special Needs - Learning disability (LD) Physical disability (PD) Mental Health (MH)

Learning disability (LD) - At least 60 bedspaces to be provided to 2036. This includes those required to be delivered on Broad Locations.

Physical disability (PD) - At least 20 bedspaces to be provided to 2036. This includes those required to be delivered on Broad Locations.

Mental Health (MH) - At least 20 bedspaces to be provided to 2036. This includes those required to be delivered on Broad Locations.

Appropriate provision must be made in Masterplans for the Broad Locations.

Policy L3 - Provision of and Financial Contributions towards Affordable Housing

Affordable housing is defined in national planning policy. Provision of or financial contributions towards affordable housing will be made as part of all new residential development, on the basis set out below:

Principles

On schemes of 10 (net) or more homes affordable housing will be provided through planning obligations. This must identify a specific land area, or part of the scheme, reserved for affordable housing and a specified affordable housing type mix. A provider and detailed provision mechanism (costed developer build and sale to provider and / or free transfer of land) must also be secured in the planning obligation.

Provision must be on site unless exceptionally and explicitly agreed otherwise by the Council.

On schemes of 100 dwellings or above, land reserved for affordable housing must be distributed to facilitate a desirable geographic spread of the affordable dwellings. A scheme for the location, design and efficient management of the affordable housing must be agreed with the identified provider as part of the planning obligation

On schemes of 9 (net) or fewer homes, a planning obligation for an equivalent financial contribution is required.

Where part of a larger site, dwelling numbers will be judged against the wider area.

Percentage requirement

A minimum of 40% affordable homes, as a proportion of the overall dwelling numbers on the site or an equivalent land area, on schemes of 10 (net) or more homes.

Affordable housing type requirements

Affordable Housing Type	Type - Definition	Type - Percentage Requirement (% as applied to 40% total requirement of affordable homes)
		Percentage requirements must be rounded to the nearest whole number on the basis of prioritising Type 1 below)
1) Affordable Housing for Rent – 'Social Rent'	Sub market rent, at a maximum of Local Housing Authority rent levels (indicative 50-60% of market rent) Secured with Local Housing Authority nomination rights	30%
2) Affordable Housing For Rent - 'Affordable Rent'	Sub market rent, at a maximum of 80% of market rent Secured with Local Housing Authority nomination rights	30%
3) Subsidised Home Ownership – including Shared Ownership, Starter Homes, Discounted Market Sales,	Schemes for 10 (net) or more Subsidised Home Ownership dwellings must include a mix of types, including at least 75% of such provision through Registered Providers	40%

Financial contributions

For schemes of 9 or fewer (net) homes, equivalent financial contributions to fund affordable housing provision on an alternative site must be provided. Only in exceptional circumstances (as outlined above), on schemes of 10 (net) or more homes, will equivalent financial contributions to fund affordable housing provision on an alternative site be considered.

The affordable housing contribution will be based on the equivalent cost of delivering affordable housing on-site (including land acquisition costs). The sum may vary depending on site circumstances and viability.

Economic / property market viability

These affordable housing requirements are generally viable in the District. They are required in full unless, exceptionally, it is clearly demonstrated that this level of provision is not economically viable. In such circumstances a reduced level of provision may be negotiated.

Any application that proposes provision or contributions at a lower level than the requirement must include comprehensive viability evidence. The evidence will be published. The applicant will also be required to fund an independent check on the viability evidence (commissioned by the Council).

Viability must be considered on the basis of a realistic assessment of the value of the site in its previous or existing use. The previous or existing use value must take account of all planning constraints and requirements set out in this Plan.

Any planning obligations for affordable housing provision or contributions that are agreed as an exception to full policy compliance (on the basis of viability at the time the permission is granted) must include a financial review mechanism. This will be based on actual sales values at the time that the development, or development phase, is 80% occupied. Review must allow for further provision, or financial contributions in lieu, when the outturn value of the development exceeds the initial viability assumptions or other circumstances enable increased viability of the scheme.

In assessing the viability of a particular mix of types of affordable housing, an assumption is made that the capital / sale value of the affordable housing is determined by build costs only and that land is provided by the developer at no cost.

On occasion, a partner provider / purchaser of the affordable housing cannot be identified and secured at the time of the grant of permission. In such instances, the land required to provide the agreed proportion of affordable housing must be identified in the planning permission and planning obligations. The permission and obligations will set out transfer to the Local Housing Authority (Council) at nil cost, subject to covenants restricting its future development to affordable housing only.

Reduced provision will not be accepted on the Broad Locations (Policy S6).

Changes of use to residential and vacant buildings

Affordable housing should always be provided in schemes for changes of use of existing buildings that require planning permission and in redevelopment schemes where existing buildings are demolished.

In some cases such schemes may only be viable if the affordable housing requirement is reduced to reflect the loss of existing economically beneficial floorspace. However, a potential reduced requirement for affordable housing on this basis must not unduly incentivise changes of use or redevelopments of buildings that perform a useful function and / or contribute to the environmental character of the District.

Reductions will only be acceptable where all the following criteria are met:

- i) The land use / building is not protected for a non-housing land use in this LP.
- ii) The existing building is not in, or has not had a recent, economically beneficial use.
- iii) The building has not been intentionally made vacant for the purpose of change of use or redevelopment (demonstrated by evidence of at least a three year period of vacancy and a significant period of active marketing at realistic prices reflecting the former use value).
- iv) The reduction is justified by evidence that, without it, the scheme is unviable.

Older persons housing

Affordable housing is required for both use class C2 Residential Care/Nursing Care home and similar and use class C3 Flexi-care and similar forms of specialist older people's / retirement accommodation.

Planning obligations will require nomination rights in favour of the care providing body at their defined affordable rates, for 40% of bed spaces or units.

St Albans City and District Council

<u>Draft Local Plan Draft Strategic Site Selection Evaluation Outcomes</u> <u>– Validation Panel</u>

DEVELOPER / SITE PROMOTER RESPONSE PROFORMA – Annex 1

Following the Validation Panel discussions and your proforma response, please see further information to clarify SADC's evidential position at Appendix 1 and Appendix 2. Please confirm your position in respect of the following point:

Responses should be received by 5pm Wednesday 20 June 2018.

It should be noted that these proforma - annex 1 responses will be published in due course.

Broad Location(s): North West Harpenden (S6 viii)

Developer / Promoter: CEG and Legal & General Homes Communities

3. The relevant draft Local Plan Policy	Yes	Any Commentary: N/A
requirements are acceptable and achievable		
This includes specifically Policies L1 Housing Size,		
Type, Mix and Density; L2 Provision of Older Persons		
Housing and Special Needs Housing; and L3 -		
Provision of and Financial Contributions towards		
Affordable Housing (including specified mix of 'social		
rent', 'affordable rent' and 'subsidised home		
ownership')		
This also includes the matrix in Appendix 1 for		
Housing Mix / Tenure		

Signed:

Charlotte Robinson James Lidgate

On behalf of: CEG (for Action for Children) Legal & General Homes

Communities

Dated: 12 June 2018

Appendix 1 - Housing Mix Matrix

Draft Local Plan – Appendix 6

Housing Mix, Tenure and Bedsize

Tenure	1 Bed	2 Bed	3 Bed	4+ Bed
Affordable Rent	14%	22%	57%	7%
Social Rent	14%	22%	57%	7%
Subsidised Home Ownership	14%	22%	57%	7%
Market Housing	14%	22%	57%	7%
All Sectors	14%	22%	57%	7%

Appendix 2 – SADC Additional Clarification 12.6.18

The Table at Plan Appendix 6 (Appendix 1 above) is based on previously published Strategic Housing Market Assessment (SHMA) evidence (both for SADC and the South West Hertfordshire area). These are available on our 'library of documents' on our website and have been for some time. Specifically, this Appendix 6 translates the SHMA Update 2015 table 4.5 directly in terms of bedsize split. Please see the relevant parts of that table reproduced below:

Tenure	Sector	1 hed	2 bed	3 bed	4+ bed	Total
Total %	All sectors	14.1	22.0	57.2	6.8	100

As is very common in SHMAs, they show considerably greater need for Affordable housing than Market housing in the District. In this case, the same table shows more than 75% of all housing need in the District is for Affordable Homes and less than 25% for Market homes. The Council, similarly to almost all, has had to take a view on balancing seeking to meet the identified needs most closely and what is actually deliverable through the planning system. A 75% Affordable and 25% Market split has no reasonable prospect of being delivered. The balance has been addressed through policies in the draft Local Plan, including most specifically L1, L2, L3 and Appendix 6.

Whilst the Council does expect to undertake further housing need/SHMA work, this will be primarily targeted at understanding the long term demographic and housing market / affordability implications of achieving a Plan (dwelling numbers) requirement / target that is now separately determined by the Government's revised

NPPF 'standard Methodology'. This new housing need/SHMA work will not alter the basic evidence of need that arises from official population projections. The Council will see if translating that evidence into deliverable Plan policy would result in different approaches in due course, but given the fundamental underlying evidence over many years, that is very unlikely to fundamentally change prior to the issue being addressed at the Examination in Public.

Policy L1 - Housing Size, Type, Mix and Density

All new housing developments will contribute to a mix of different housing types. This includes directly addressing the evidence of local need, while taking into account the existing pattern of development in the area and site-specific factors.

Mix, type and size will be judged comprehensively and not just on bedroom numbers in isolation. Where necessary to ensure policy aims are achieved, this will include an assessment of overall dwelling size, proposed bedroom numbers and numbers of habitable 'non-bedroom' rooms.

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The affordable housing size, type, and mix must broadly reflect that being provided for the market element of all development.

All new housing will be developed at a density that is consistent with achieving high quality, sustainable design that does not compromise the distinctive character of the area in which it is situated. Higher density development in accessible urban locations with good access to services will be supported.

Development proposals that fail to make efficient use of land for housing, having appropriate regard to local character and site-specific factors, will be refused permission.

In Broad Locations a minimum average net density of 40 dwellings per hectare is required.

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Viability must be considered on the basis of a realistic assessment of the value of the site in its previous or existing use. The previous or existing use value must take account of all planning constraints and requirements set out in this Plan.

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Reduced provision will not be accepted on the Broad Locations (Policy S6).

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In some cases such schemes may only be viable if the affordable housing requirement is reduced to reflect the loss of existing economically beneficial

floorspace. However, a potential reduced requirement for affordable housing on this basis must not unduly incentivise changes of use or redevelopments of buildings that perform a useful function and / or contribute to the environmental character of the District.

Reductions will only be acceptable where all the following criteria are met:

- i) The land use / building is not protected for a non-housing land use in this LP.
- ii) The existing building is not in, or has not had a recent, economically beneficial use.
- iii) The building has not been intentionally made vacant for the purpose of change of use or redevelopment (demonstrated by evidence of at least a three year period of vacancy and a significant period of active marketing at realistic prices reflecting the former use value).
- iv) The reduction is justified by evidence that, without it, the scheme is unviable.

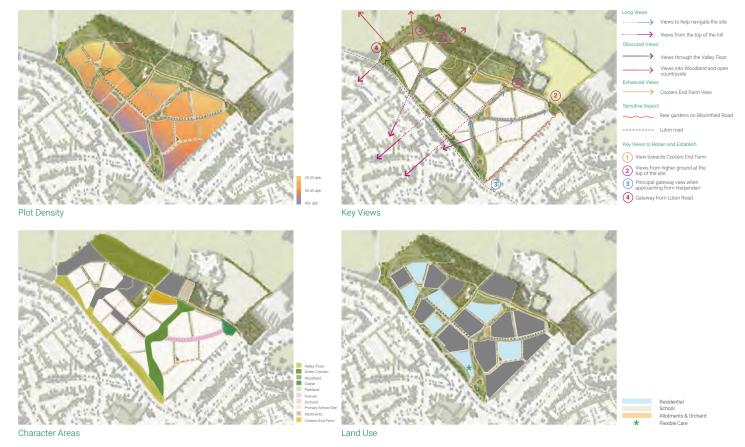
Older persons housing

Affordable housing is required for both use class C2 Residential Care/Nursing Care home and similar and use class C3 Flexi-care and similar forms of specialist older people's / retirement accommodation.

Planning obligations will require nomination rights in favour of the care providing body at their defined affordable rates, for 40% of bed spaces or units.



Illustrative Masterplan





St Albans Local Plan - Statement of Common Ground between St Albans City & District Council (SADC) and Alban Developments Limited & Adrian Irving (Trustee) - West of Chiswell Green Broad Location (S6 x)

1. Introduction

This Statement of Common Ground (SoCG) has been jointly prepared by St Albans City & District Council (SADC) and Alban Developments Limited & Adrian Irving (Trustee) in relation to the Local Plan Broad Location S6 (x) – West of Chiswell Green. It concisely considers areas of agreement between the parties following the Alban Developments Limited & Adrian Irving (Trustee)'s representations on the St Albans Draft Local Plan in order to confirm the soundness and robustness of the Broad Location. It is anticipated that further agreed detail may be available by the time of the commencement of the Local Plan Hearing session on 21 January 2020.

The agreed matters in this SOCG do not preclude any further written or verbal representations that the District Council and Alban Developments Limited & Adrian Irving (Trustee) may wish to make as part of the Local Plan Examination.

Alban Developments Limited & Adrian Irving (Trustee) is working collaboratively, cooperatively, proactively and productively with SADC and all relevant partners to bring the site forward for development as set out in Policy S6 (x).

It is important to also consider alongside this document the signed Local Plan Developer / Site Promoter Response Proforma 2018 as set out at Appendix 1.

2. Legal Compliance; Duty to Co-operate and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

The parties consider that the Local Plan is legally compliant and that St Albans City & District Council has fulfilled the Duty to Co-operate. Furthermore, it is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement and appropriate bodies have been consulted. A comprehensive and robust Sustainability Appraisal has also been carried out to support the Local Plan.

3. The Site

The site S6 (x) is shown on the Draft Local Plan Policies Map (CD003) and a map of the directly relevant area controlled/owned by Alban Developments Limited & Adrian Irving (Trustee) is given in Appendix 2.

The parties agree that exceptional circumstances exist to justify the Plan's proposed removal of land from the Green Belt.

4. Broad Location for Development

The parties for the site agree that Policy S6 (x) is sound and robust in principle and evidence shows that all requirements can and will be delivered at the point in time currently envisaged in the Plan, or earlier:

Policy S6 - Broad Locations for Development

The Development Strategy (Policy S2) identifies a series of "Broad Locations" for development to contribute to meeting housing, infrastructure and other development needs over the plan period. Broad Locations and the associated revised Green Belt boundaries are identified in indicative form on the Key Diagram and in detail on the Policies map.

All Broad Locations must meet the Policies set out in this LP and as shown on the Policies Map. Planning applications for development at the Broad Locations must materially accord with Masterplans which have been approved by the Council following consultation with local communities and key stakeholders.

Policy S6 x) – West of Chiswell Green Broad Location

Objective

To provide an urban extension of Chiswell Green.

Proposals

The development will be required to deliver:

- 1 Masterplanned development led by the Council in collaboration with communities, landowners and other stakeholders
- 2 Minimum capacity 365 dwellings
- 3 Minimum 40% Affordable Housing in accordance with Policy L3
- 4 Minimum overall net density 40 dwellings per hectare
- 5 Housing size, type and mix as set out in Policy L1 and Appendix 6.
- 6 Retention of important trees and landscape features
- 7 Recreation space and public open space
- A site for and appropriate contributions towards a 2 Fe primary school, including Early Years provision
- 9 Transport network (including walking and cycling links) and public transport services upgrades/improvements
- 10 3% of homes provided to be self-build housing
- 11 Sufficient assets to provide sustainable management of community facilities, open spaces and parklands
- 12 Excellence in design, energy efficiency and water management
- 13 Appropriate renewable energy production and supply mechanisms

It is acknowledged by the Parties that the delivery of a site for a 2 FE primary school goes beyond the needs of the development itself and that this will be accounted for in any future financial contributions that may be required in response to a planning application for the development of the site.

5. Outstanding Matters

The following limited outstanding matters remains between the parties, in regard to Policy S6 (x):

1 - The Council's Infrastructure Delivery Schedule also refers to the provision of 87m² healthcare facilities on the site. In the Site Promoter's Regulation 19 representations details were presented as to existing capacity of healthcare facilities in the vicinity of the site

6. Masterplanning and Delivery

The parties confirm their willingness to progress a timely planning application in order to meet (or come forward sooner than) the programme of completions in the Plan housing trajectory. Whilst still to undergo significant further iteration generally through the processes set out in the Strategic Sites Masterplanning Toolkit, including responding to public engagement, an indicative Masterplan can be seen at Appendix 3.

Both parties are fully committed to the masterplanning process and site promotional work to date demonstrates that the site is deliverable.

With regard to the stepped trajectory in Policy S4 and Appendix 2 of the Plan, it is agreed that the Chiswell Green site is capable of earlier delivery than that shown.

7. Appendices

- 1. Local Plan Developer / Site Promoter Response Proforma
- 2. A plan of the directly relevant area controlled/owned by Alban Developments Limited & Adrian Irving (Trustee)
- 3. Indicative masterplan
- 4. Responses to the Matter 7 Questions

Signatories:



On behalf of Alban Developments Limited

Dated: 16 December 2019

Signed:



Dated: 16 December 2019

On behalf of Adrian Irving (Trustee)



Chris Briggs Spatial Planning Manager St Albans City and District Council



Appendix 1

St Albans City and District Council

<u>Draft Local Plan Draft Strategic Site Selection Evaluation Outcomes</u> <u>- Validation Panel</u>

DEVELOPER / SITE PROMOTER RESPONSE PROFORMA

Following the Validation Panel discussions (see discussion agenda attached for reference – Appendix 2) and in relation specifically to the Policies and Policies Map set out in the indicative draft Local Plan presented to the Council's Planning Policy Committee on 22 May, please confirm your position in respect of the following points:

Your response should be brief / in note form and be comprehensible to an informed reader without additional reference material.

Your response should be no longer than 4 sides (including Appendix 1).

Responses should be received by 5pm Thursday 31 May 2018.

It should be noted that these proforma responses will be published in due course.

Broad Location(s): Policy S6(x): West of Chiswell Green Broad Location

Developer / Promoter: Alban Developments Limited & Adrian Irving (Trustee) ("the Land Owners")

	1. The draft Broad Location is 'available' There are no issues which are overriding constraints to development in terms of land ownership, restrictive covenants etc.	Yes	•	The Land Owners have each other with joint replan consultations. A Joint Delivery Statem Policy S6(x) has been sthe Council. The Land Owners confiunction which may affect the available.	epresentations submonent confirming the signed by both land firm that there are no	ability to deliver draft owners and issued to	
	2. The draft Broad Location is 'Deliverable / Achievable' There is a reasonable prospect that the		•	A viability appraisal has costs and revenues wou range has provided to dwelling mix, future value	uld be associated was account for fluctu	ith the development. A nations in the market, nt programme.	
	development, including all			Revenue/Cost	Minimum	Maximum	
	key aspects being assessed				Revenue		
	as part of the overall 'package' proposed, is	Yes	Yes		Market housing Gross Development Value	£90.4 million	£110.6 million
	viable and deliverable			Yes		Affordable housing Gross Development Value	£35.2 million
				Total revenue	£123.4 million	£146.2 million	
					Costs		
				Land acquisition + fees + construction costs	£90.7 million	£101.2 million	
				Professional fees & CIL/S106 costs	£8.1 million	£11.1 million	

Overheads

Finance

Sales & Marketing fees

£1.5 million

£3.2 million

£5 million

£2.1 million

£4.2 million

£6.5 million

	Γ		Total costs	£108.5 million	£125.1 million
			Profit	£14.9 million	£21.1 million
		•	The above figures confi		
		•	A written Expression of	•	
			Homes Ltd (copy provided separately) confirming their interest in		
			the site bearing the draft policy forward in accordance with the draft		
			Local Plan policy requirements.		
		•	It is also noted Alban D	Developments Ltd is	s an experienced local
			housebuilder that was e		•
3. The relevant draft Local		•	Policy L1: All new hous	ing will be provided i	n a range of types (inc.
Plan Policy requirements			flats and family sized h	• •	•
are acceptable and			Space Standards in acc		•
achievable. This includes			Appendix 1 of this pro-		
specifically Policies L1 Housing Size, Type, Mix			recent housing needs ev		SADC) at a net density
and Density; L2 Provision		_	of at least 40 dwellings policy L2: Despite draft		ntaining a requirement
of Older Persons Housing		•	for this Broad Location		
and Special Needs Housing;			minimum of 5% of th		
and L3 - Provision of and	Yes		designated as retiremen	•	•
Financial Contributions			Building Reg Part M4(2)	• • •	•
towards Affordable Housing		•	Policy L3: At least 40%	of all new housing of	delivered on site will be
(including specified mix of			affordable and will con	form with the prop	ortions of social rent,
'social rent', 'affordable rent'			affordable rent and su		
and 'subsidised home ownership') This also inc.			Appendix 1. Land reser		
the matrix in Appendix 1 for			potted across the sit		hat enables efficient
Housing Mix / Tenure			management by a Regis	stered Provider.	
4. The relevant draft Broad	Yes	•	The Land Owners w	ill collaborate with	n the Council, local
Location policy			communities and other	r stakeholders ove	r the evolution of a
requirements (S6 -			masterplan, including u	•	•
individual Broad Location as			provide independent scr		•
applicable) are acceptable and achievable.		•	The illustrative masterp		
and acmevable.			dwellings can be deliver 40dph.	ed at an average no	et density in excess of
			A tree survey has been	undertaken to ensu	re that important trees
		•	and landscape features		To that important tiees
		•	Recreation space and		will be delivered and
			sustainably managed in		•
			Policy requires approxir		
			provided, and this will b		
			provision for the Broad		
			Policy, the development teenage areas, parks an		
			space, allotments and n		
			also recognised that the		•
			designated Local Green		
		•	A 2-hectare serviced site		
			years provision, and asso		
			an appropriate CIL or S		
			with Reg. 122 of the CIL	_	-
		•	To discourage reliance		
			car ownership levels with Green, a package of su		
			including residential and		
			morading residential and	a somoon mavor piam	o, a oai olab solicille,

electric vehicle charging points, contributions to improvements to NCN Route 6, local bus services and cycle parking facilities at How Wood Station. On the latter, contributions are proposed to the provision of cycle storage for 80 to 160 bicycles (est cost £12,500 to £25,000) (further discussions will be required with Network Rail to determine the appropriate storage system to suit the capacity of the station). A technical review of the optimum walking and cycling routes from the site to the local train stations will also be undertaken and proportionate financial contributions provided to help resolve existing deficiencies that are agreed with the highway authorities. Preliminary options explored include a new puffin crossing over Watford Road (est cost £80,000), a new puffin crossing over A414 (est cost £160,000), and upgrades to the existing footpath along Tippendell Lane between Watford Road and Park Street Lane (est cost £90,000)¹.

- Highway improvement works at the Watford Road / Chiswell Green Lane / Tippendell Lane junction (see Transport Assessment accompanying our previous Regulation 19 representations for details) will also be undertaken to improve access onto the wider highway network.
- 3% of the total homes provided will be self-build plots.
- The design principles of Policy L23 will be met, and as part of the collaborative masterplanning process, opportunities taken to create a new residential neighbourhood with a coherent and distinctive character.
- In accordance with Policy L25, an energy strategy will be provided and will incorporate best practice solutions and those required under Part L Building Regs. Measures to improve the environmental performance and reducing carbon emissions of the development may include communal heating systems, solar photovoltaic panels, passive design measures and rainwater harvesting.
- The Flood Risk Assessment provided with our previous Regulation 19 Representations reveals the use of infiltration drainage techniques are likely to be feasible, and on this basis SuDS features will form the basis of the masterplan.
- 5. The relevant draft Broad Location requirements as set out on the Policies Map (individual Broad Location as applicable) are acceptable/achievable

Yes

- It is noted that the broad location boundary (marked by a purple line) is not identified on the key, and as drawn it contains a number of residential properties on the south side of Chiswell Green Lane that do not form part of the promoted site. Please refer to Call for Sites submission for confirmation of the site boundary.
- 6. The 'deliverable / achievable' community benefits (of all relevant kinds) to help the Council in consideration of 'exceptional circumstances', including any 'additionality' or 'beyond standard' elements, are considered to be (listed in
- 1. Significant contribution towards meeting the City and District's acute objectively assessed housing need.
- 2. In a prime location to provide homes to support the Council's economic growth strategy, given its location and connectivity to key institutions of the Herts EnviroTech EZ.
- 3. Least impact on the openness of the Green Belt compared to all the other Broad Locations. With much of the City and District falling within the Green Belt and the lack of available land within existing urban areas, choosing the least harmful sites and most sustainable sites is crucial in adhering to NPPF Policy and the *Calverton* judgement.

¹ Please note that the costs specified a preliminary estimate of the civil engineering costs and exclude fees involved with design and implementation, maintenance and legal costs.

brief, no specific limit on number):	 Unlike the other Broad Locations, this allocation offers unique characteristics, most notably in terms of its smaller size and ability to come forward early in the plan period to improve the robustness of the Council's 5 year housing land supply (see response to question 7). Provision of a serviced site for a 2FE primary school, inc. early years provision that goes beyond meeting the needs of the development itself. Additional benefit: offer of retirement (Class C3 use for 55+ year old's) housing as detailed above (despite not being a requirement of Policy S6(x)). Additional benefit: offer of a flexibly designed community facility (despite not being a requirement of Policy S6(x)). Package of sustainable transport measures, as detailed above, to reduce reliance on car ownership. Including additional benefit of improvements to NCN Route 6 and cycle storage at How Wood Station to serve the wider community. Additional benefit: Ecological enhancements e.g. habitat creation, woodland walks, bat boxes, new water features. Additional benefit: Opportunity to create a new connection to the site of the former Butterfly World to the west of the site. Additional benefit: New, genuinely accessible public open space that can be used by the wider community as well as those new residents living within the development.
7. Any other important	Subject to the grant of planning permission shortly after the envisaged
considerations which the	adoption of the Local Plan in the spring of 2020, construction work would
Council should be aware of	commence in August 2020 with the scheme completed by mid-2025. To help
	boost the delivery of housing in the first 5 years of the plan period, the
	following completion rate is considered achievable:
	• Aug 2020 – 2021 – 80 units
	• Aug 2021 – 2022 – 80 units
	• Aug 2022 – 2023 – 80 units
	• Aug 2023 – 2024 – 80 units
	- 7 kg 2020 2027 00 dilito

......Date: 31/05/2018 Date: 31/05/2018

Aug 2024 - May 2025 - 50 units

On behalf of the owners of Chiswell Green Farm Limited - Adrian Irving (Trustee)

On behalf of Alban Developments

Appendix 1 - Housing Mix Matrix

Draft Local Plan – Appendix 6 Housing Mix, Tenure and Bedsize

Tenure	1 Bed	2 Bed	3 Bed	4+ Bed
Affordable Rent	14%	22%	57%	7%
Social Rent	14%	22%	57%	7%
Subsidised Home Ownership	14%	22%	57%	7%
Market Housing	14%	22%	57%	7%
All Sectors	14%	22%	57%	7%



Appendix 2

The scaling of this drawing cannot be assured Drn Ckd Revision

LEGEND



- Adrian Irving (Trustee)
- Alban Developments Limited
- Woodland under separate ownership and not proposed for development.

NOTES:

The masterplan has been devised to take the ownership arrangements into account and only build on land under our clients control.

Chiswell Green St Albans

Drawing Title

Site Location Plan and Ownership Plan

Date 19.02.18	•	Scale 1:10,000 @A	Drawn by JF	Check by GS
Project No		Drawing No		Revision
20504		SK-160212		-
	100	300		500m
0		200	400	

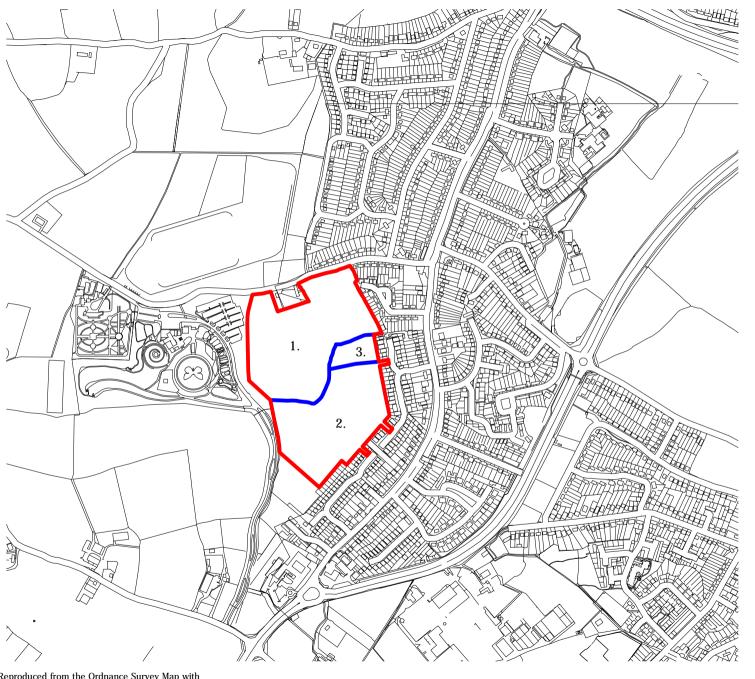


Planning Master Planning & Urban Design Architecture Landscape Planning & Design Environmental Planning Graphic Communication Public Engagement Development Economics

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Appendix 3





Appendix 4

Written Statement

12/19

St Albans City & District Local Plan Examination

Matter 7

On behalf of Alban Developments Ltd and Adrian Irving (Trustee)



jb planning associates

Chells Manor, Chells Lane, Stevenage, Herts, SG2 7AA e-mail info@jbplanning.com url www.jbplanning.com tel 01438 312130 fax 01438 312131

Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

Introduction

- 1 This Written Statement has been produced on behalf of CALA Homes in conjunction with Redington Capital in order to supplement their earlier representations.
- ADL and Adrian Irving (Trustee) are the respective freehold owners of the land identified for development within the West of Chiswell Green Broad Location.

 CALA Homes are the chosen developer partner of ADL and Redington Capital have an interest in land owned by Adrian Irving (Trustee).
- Since 2014, JB Planning Associates have, on behalf of ADL and CALA Homes, worked with Barton Willmore LLP on behalf of Adrian Irving (Trustee) and Redington Capital, on the joint promotion of Green Belt land that lies to the west of Chiswell Green, Hertfordshire ("the Site") as a Broad Location for Development.
- The main issue identified by the Inspector to be examined in relation to Matter 7 is: Whether the detailed policy for each broad location for development is justified, effective and consistent with national policy. In relation to the West of Chiswell Green Broad Location, 7 specific questions are posed, responses to which, are provided below.

West of Chiswell Green S6 (x) (An urban extension of Chiswell Green)

Questions:

- Q.1 Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?
- The promoters strongly support St Albans District Council (SACDC)'s development strategy, and reiterate their commitment to seeing the site developed as early as possible during the Plan period. Our Regulation 19 representations highlighted that delivery could commence as early as 2020/21 and be completed in 2024/25. The promoters have already entered into discussions with the Council over the preparation of a masterplan, and look forward to developing the masterplan for the site in collaboration with SACDC, the local community and other stakeholders.



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

- In relation to the site's suitability for housing, we would highlight the findings of the 'Green Belt Review Sites & Boundaries Study' (February 2014) prepared by Sinclair Knight Merz (SKM) on behalf of SACDC (Examination Document: GB 001). It provided a detailed and robust assessment of eight strategic sub-areas in the District that were considered to contribute the least towards the five Green Belt purposes.
- It concluded that Sub-Area S8 is the most suitable site for Green Belt release; being ranked 1st out of the 8 sites assessed. In reaching this conclusion, the review establishes in para 10.5.4 that:

'This area of land does not significantly contribute towards any of the five Green Belt purposes. It makes a partial contribution towards safeguarding the countryside from encroachment. It makes a limited or no contribution towards checking sprawl, preventing merging, preserving setting and maintaining the existing settlement pattern.'

- 8 It confirmed that the site is well enclosed by surrounding land form and vegetation. Furthermore, it noted that there are no landscape, ecological or cultural heritage designations, and visual impacts would be localised.
- A comprehensive suite of technical documents have been prepared by an expert consultant team in order to demonstrate that West of Chiswell Green Broad Location is free from constraint and is available, suitable and deliverable. Key findings of these detailed assessments are highlighted below, together with their relevant appendix numbers within our Regulation 19 representations.

Transport

The Transport Assessment (TA) and Addendum produced by Glanville
Consultants (Appendices 5 and 6) describes how the road layout shown on the
Illustrative Design Concept (Appendix 4) seeks to distribute traffic as evenly as
possible between four access points onto the surrounding highway network.
Glanville has considered the capacity of all of the junction points with Watford
Road in the Transport Assessment and determined that all have significant spare
capacity apart from the Watford Road / Chiswell Green Lane double mini-



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

roundabout, where there are existing capacity issues. In this regard, the development of the Site presents an opportunity to secure improvements to this junction to mitigate the effects of the development and deliver improvements that will also benefit the wider community.

Flood Risk

The Flood Risk Assessment (Appendix 7) identifies that the site is located within Flood Zone 1. It proposes a surface water drainage strategy that utilises sustainable surface water drainage strategy techniques, including the use of porous paving to facilitate the discharge of surface water by infiltration to the underlying soil strata and attenuation features providing storage for the 1 in 100 + 30% climate change storm event. As such, discharge volumes from the Site will not increase as a result of the proposed development for all storm durations up to and including this event. This evidence was used to inform the Illustrative Design Concept (Appendix 4) and the updated Chiswell Green Concept Plan (see the Annex to this Written Statement).

Utilities and Drainage

The Utilities and Foul Water Drainage Assessment (Appendix 8) established that existing gas, electricity, potable water, telecommunications and foul water infrastructure all exist in the vicinity of the Site. Given the size and prevalence of existing infrastructure in the vicinity of the Site, it is anticipated that there will be no problems with provision of new supplies to the Site.

Ecology

13 The Preliminary Ecological Appraisal (Appendix 9) prepared in January 2016 (and updated in October 2018). It identifies little of ecological note. There is some potential for bats to be present and a low likelihood of reptiles using the Site. Mitigation for bats, reptiles and nesting birds (if present) is possible, and could include the erection of bird and bat boxes and the provision of informal open space, kept rough. Updated ecological assessments will be carried out ahead of any formal planning application.



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

Healthcare

- The Healthcare Assessment (Appendix 10) identifies that there is surplus capacity to accommodate an additional 2,918 patients at the Midway Surgery, which is more than sufficient to absorb new residents from the proposed allocation.

 Assuming an average household size of 2.5 people per household applied to the circa 370 units proposed, the development could give rise to an additional 925 patients. However, not all of the residents will be new to the area, and many will continue to utilise their existing GP services.
- The Healthcare Assessment found that the area is well provided with dental treatment facilities and a telephone survey, conducted in October 2018, established that all dental practices identified are accepting new patients on a private basis (a number of whom are also accepting new fee exempt (NHS) patients). Noting the above findings, we refer to the overarching representations prepared by Barton Willmore LLP and specifically the representation on Policy L17 (Infrastructure). This questions the soundness of the requirement of the Infrastructure Delivery Schedule (IDS) for the site to deliver 87sqm of health floorspace on the site. Aside from such a sized facility being impractically small to accommodate a typical GP surgery, the Healthcare Assessment demonstrates that such provision is not necessary in view of existing healthcare capacity in the area.

Landscape

- The Landscape and Visual Appraisal (Appendix 11) (LVA) identifies that that views of the Site from the surrounding area are largely restricted due to the presence of adjoining residential development to the east and south-east, and Butterfly World to the west, with rising landform to the west, north and north east which, along with surrounding woodlands and hedgerows, assist in enclosing the land.
- 17 The LVA supports the assessment of the 'Green Belt Review's that the site makes limited or no contribution to the five purposes of Green Belt, largely as a result of its urban fringe location between the settlement edge of Chiswell Green and Butterfly World. It concludes that residential development would assimilate well into the existing western edge of Chiswell Green, and new woodland and hedgerow planting would help integrate the built structures within the local



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

landscape character. In addition, a new rational, robust and defensible Green Belt boundary would be created along the western edge of Chiswell Green.

Contamination

The Geo-Environmental Desk Study Report (Appendix 12) produced relates to the northern part of the Site, and concludes that the study site is considered overall at being at low risk from contamination. This corresponds with the conclusion reached by SACDC, in its own evaluation, that no contaminated land has been identified across the whole Site.

Trees

The Arboricultural Constraints Summary (Appendix 13) Constraints Summary comprises of a survey of the existing trees on the northern part of the Site. The Tree Constraints identifies the quality of existing trees, whether they should be retained or removed and also conveys the root protection areas. In addition the assessment identifies 3 separate groups of Tree Preservation Orders which are located along the western boundary of the study site. These are also acknowledged by SACDC in its own evaluation of the whole Site, which confirms that trees do not represent a constraint to development, since they can be retained and enhanced as features in the development area.

Archaeology

- The Archaeological Desk Based Assessment (Appendix 14) also relates to the northern part of the Site and establishes that there are no designated archaeological heritage assets within or in close proximity to the study site. This reflects the conclusion reached by SACDC, in its own evaluation of the whole Site, that there will be no adverse effects on heritage assets and the Site has no archaeological potential. The Site does not contain any listed buildings and is not subject to a conservation area designation.
- 21 Consequently, the proposed West of Chiswell Green allocation is located in a highly suitable and unconstrained location on the edge of a very sustainable large village settlement and its development will not result in any significant harm to the Green Belt.



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

Q.2 What evidence is there to demonstrate that the broad location is capable of delivering 365 dwellings?

- Our Regulation 19 representations contained an Illustrative Design Brochure (Appendix 4) which was prepared for the Site to illustrate the capability of the emerging development proposals to deliver circa 365 dwellings; a 2 form entry primary school which is capable of accommodating a flexibly designed dual-use community facility; recreation and open space provision. The Illustrative Design Brochure demonstrates that a minimum of 365 dwellings can be delivered at an average net density in excess of 40dph. This has been further supplemented by a revised Concept Plan that has very recently been prepared (see Annex), which demonstrates that the range of policy requirements sought in respect of the proposed allocation are fully capable of being accommodated on the site.
- The site layout has been produced to fully accord with the various policy requirements set out in the emerging Local Plan.

Q.3 Should the specific location for the primary school within the site be identified?

- 24 Preliminary studies have been undertaken to demonstrate that a 2FE primary school can be successfully accommodated on the site and linked into existing infrastructure.
- Whilst a 2-hectare serviced site for a 2FE primary school, including early years provision and associated playing field, has been identified towards the northeast corner of the site, further consideration will need to be given to the appropriate siting of the school through the masterplan process. We consider that it would be both unwise and overly restrictive to specify a specific site for the school now, which might subsequently prove to be neither the most suitable nor appropriate location to meet future education needs in the area given that educational requirements are often subject to significant change and need to be able to adapt to changing circumstances (including new educational demand and provision arising in the wider locality of the local area). We reaffirm the site promoter's commitment to the masterplanning process and working with the District Council and County Council to ensure that a suitable location for the school is identified.



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

In providing a serviced site for the school any financial contributions provided would be proportionate to that need served by the development and account for the cost of providing the land for the school site. Additional education related financial contributions to deliver the school will be sought from other developments in the local area.

Q.4 .What further infrastructure work needs to be undertaken, and is this appropriate to be left to the masterplanning stage?

- Given that the infrastructure work associated with the proposed allocation is considered to be of a relatively small-scale only, it is indeed considered appropriate for this particular aspect to be addressed at the masterplanning stage.
- Our response to Q.1 highlights that a range of technical studies have been undertaken to demonstrate that local infrastructure has the capacity to accommodate the development and a sound basis to allocate the site. These studies will be updated, refined and developed through the masterplanning process and into a planning application. Accordingly, the main infrastructure issues relevant to the site have been already tested and have informed the Council's choice in selecting this site as a broad location.

Q.5 Should the policy refer specifically to the provision of sports facilities?

The Illustrative Design proposals make provision of land to accommodate a flexibly designed community facility, it is intended that further discussions over potential uses will take place as part of the collaborative masterplanning exercise with the local community and other stakeholders. This would include delivering a range of recreational facilities to encourage play and physical activity that will support the healthy towns and cities agenda. By setting aside 40% of the site area as non-developable land¹, this will ensure there is adequate opportunity for a variety of forms of recreational facilities, including sports facilities to be included. There is clearly an opportunity to explore the dual use of the school playing fields for sports purposes.

¹ Comprises public open space, roads, required services and facilities such as education or health activities; as well as any retained open land for landscaping



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- Recreation space and public open space will be delivered and sustainably managed in accordance with Policy L28 of the Local Plan Publication Draft. Table 1 of this Policy requires approximately 3.4 hectares of open space to be provided, and this can be achieved. The precise use of recreation space will be discussed further through the collaborative masterplanning exercise. We note that the priority provision for West of Chiswell Green (as set out in Policy L28) is strategic play, teenage areas, and children's play areas. It is also recognised that the new school playing fields will be treated as designated Local Green Space (Policy L21).
- Whilst we have no objection to the policy making a general reference to the provision of sports facilities, we would be concerned if it was over-specific. We consider that the masterplan route is the appropriate means to establish the most appropriate location and mix off recreational and sporting provision facilities.

Q.6 Has consideration been given to air quality and any mitigation measures?

- The proposed development is not anticipated to give rise to any specific concerns about air quality. Of the three Air Quality Management Areas (AQMA's) located within St Albans District, the nearest, AQMA No. 7 is located 2.5 km away at Frogmore and Colney Street in the vicinity of the M25.
- It should also be noted that four potential access points have been identified from Chiswell Green Lane to the north and the residential estate roads (Forge End and Long Fallow) to the east. All of these roads lead to the main arterial route through Chiswell Green, the Watford Road (B4630).
- The TA identifies that the Site is accessible by a range of transport modes and is in a sustainable location with good access to a wide range of local facilities, amenities and employment opportunities. The effect of the development can be further reduced through the adoption of an effective Travel Plan.
- The TA Addendum (Appendix 6) presents the findings of a recent review of the Transport Assessment to establish whether there are any material changes which have taken place since it was prepared in 2016 that would alter its conclusions. It finds that there have not been any material changes, and the conclusions of the original TA remain valid. Further consideration is also given in the note to the



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

accessibility of local railway stations from the site, and it is demonstrated that Part Street, How Wood and St Albans City Station are all within a reasonable walking and cycling distance. Potential improvements to these routes are identified.

Consequently, suitable regard has been had to air quality, and measures identified that will insure that impacts from the development of the proposed allocation site are minimised and dispersed. Should Air Quality need to be addressed further, this should be done at the planning application stage, but there is no current evidence to suggest that the allocation should not go forwards from an air quality point of view.

Q.7 How have heritage assets been considered and is a Heritage Impact Assessment required?

- The CgMs Archaeological Desk Based Assessment submitted with our Regulation 19 representations (Appendix 14) established that there are no designated archaeological heritage assets within or in close proximity to the study site, and for those in the wider area that their setting or significance will not be impacted by the development of the site. Accordingly, a general Heritage Impact Assessment was not prepared that considered the wider impacts of the proposed allocation, principally as there are limited heritage assets in the locality so any impacts, if any, would be limited and would be likely to create no harm.
- The Archaeological Assessment established that a theoretical potential exists for Roman activity within the study site along with a localised potential for Post-Medieval associated with Chiswell Green Farm. It concluded that on balance, should archaeological deposits be present, they are anticipated to be of local significance. These potential undesignated heritage assets are not considered to be of sufficient significance to preclude development.
- The assessment found that to better understand the potential impact of the proposals and significance of any archaeology at the site, it was anticipated that the Local Authority Archaeological Advisor will require additional archaeological investigation to test the presence/absence of archaeological remains and to inform on any planning application submitted. Once the concept of development at the site had been established it is considered that any impacts of the proposed development can be successfully mitigated against. The mitigation is likely to take the form of preservation in-situ, within areas of open space or undeveloped land,



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

or preservation by record, where detailed archaeological excavation and reporting is undertaken prior to development taking place.

PC/1298 12 December 2019



Written Statement on behalf of Alban Developments Ltd and Adrian Irving Trustee

Annex





planning associates

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Annex 1: Infrastructure Delivery Schedule Update

Schedule (Table) available as separate document for ease of reading

IDS Explanatory Note

The IDS provides an overview of key infrastructure requirements, especially those related to the Local Plan Broad Locations for Development. It does not provide a full list of all infrastructure schemes that will be considered, programmed and implemented over the Plan period.

The IDS only includes estimated costs of currently known, site specific, infrastructure required to facilitate development at the Broad Locations for Development.

There will be a significant number of additional costs related directly to development that will be identified through Masterplanning (Policy S6) and detailed in the Plan Infrastructure Delivery Schedule (Policy L17).

Both IDP & IDS are 'live' documents which will be updated at appropriate intervals as and when further information becomes available.

The IDS assumes land required for infrastructure and public uses will be provided by the landowner at nil value. If given notional alternative use land values these would be significant.

This IDS gives no cost to the land owner subsidy on the value of affordable housing. A 'rule of thumb' expectation / nominal 'value' in this area this would be at least £150,000 per dwelling.

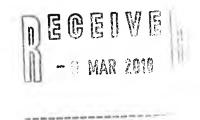
The IDS and IDP should be read in conjunction with the emerging viability evidence referred to in the Plan (Policy L17).

A Infrastructure Delivery Schedule (IDS)	В	С	D	E	F	G	Н	I	J	K	L	М	N	0	P	Q	R
initiasi detale benvery schedule (193)	East Hemel Hempstead (North) Broad Location	l Hempstead oad Location	el d Broad	East St Albans Broad Location	bans Broad	Harpenden rtion	t Harpenden Ition	ndon Colney Ition	iswell Green Ition	Park Street Garden Village Broad Location	BL ant		urce(s): /developer &/or CIL ner (0)	Key delivery stakeholder(s): landowner/developer (D); LA; HCC; Other (O)		t delivery phase by yr / by yr 10 / by yr 15 nked to trajectory	
	st Hemei orth) Bro	East Hemel Hempst (South) Broad Loca	North Hemel Hempstead Broad Location	st St Alb	No rth St Albans Location	North East Harpe Broad Location	North West Harpe Broad Location	West of London (Broad Location	West of Chiswell	ırk Streel Ilage Bro	Other Non BL development	TOTAL	Funding source(s): landowner/develo (D) / S106 &/or CIL (S&C) / other (O)	y deliver ikeholde idowner); LA; HC	Est Cost	t deliven by yr 10 iked to t	
LOCATION	2 B	Ea (S	공 품 의	Ea	2 2	No Bra	N E	žä	Σğ	Pa	ಕ ಕ	2	E G	Ke sta lar	ES	Est 5/ Lin	NOTES
Infrastructure																	
Transport Infrastructure:											y ***		D; S&C O		£72.5m *	by10/by15	* Estimate for 4 x SLP proposed locations. Other BL tbc £ to be confirmed as costed schemes become available *** contributions towards transport infrastructure from non BL dev £TBC
																	* Linked to EHHC E See LTP / GTP for estimates **S&C beyond site area may contribute to transport infrastructure where it has strategic role serving a wider area.
Strategic - LTP4 major scheme	v*	v*								v	v**		D; S&C**; O	D; HCC; O	see above	by10/by15	Delivery & funding to include transport agencies & providers
Local highway - on & off site	Υ	Y	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Y			D: S&C	D: HCC	see above	by10/by15	
Sustainable travel - public transport	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ			D; S&C	D; HCC		by10/by15	
Sustainable travel - walking + cycling on													,	,		,,,,5,,25	
& off site	, I	v	v	v	v	v	v	v	v	v	1		D; S&C	D; HCC	see above	by10/by15	
OK OTT SILE	-				l'	'						-	υ, σας	D, FICE	see above	Dy10/Dy13	
			-	-	-						-	-	-	-	1	-	Land provided at nil cost to HCC
																	Land provided at nil cost to HCL *S&C beyond site area may provide additional funding where planned school capacity exceeds onsite school population
Education:											y ***		D; S&C*	D; HCC		by10/by15	*** contributions towards education infrastructure from non BL dev £TBC
Primary (assumes £8.7m per new 2FE																	
primary school or £12.4m per new 3FE		1 x 3fe								1 x 3fe	1 x 2fe						Est 2.25 Ha per new 2FE primary school or 2.95 Ha per new 3FE primary school
primary school)	1 x 3fe	1 x 2fe	1 x 3fe	1 x 3fe	1 x 2fe	1 x 2fe *	1 x 2fe *	1 x 2fe		1 x 2fe	1 x 3fe	34 fe	D; S&C	D; HCC	£144m	by10/by15	* Site and appropriate contribution
Secondary (assumes £37.3m per new													-,			2,20,0,20	Est 12-15 Ha per new secondary school
8FE secondary school)	1 x 8-10fe			1 x 6-8fe				1 x 6-8fe		1 x 6-8fe		26fe - 34fe	D: S&C	D; HCC	£149.2m	by10/by15	To be provided in GB location next to housing areas except PSGV
Early years	ν	٧	γ	γ	v	γ	٧	ν	γ	γ			D; S&C	D; HCC	£3.6m	by10/by15	Est for nursery provision
Luny years					<u> </u>								5,500	5,1100	25.0111	0,10,0,13	Est for hursery provision
																	CMO = community management organisation required Land provided at nil cost
		5140									v***		D; S&C	D; CMO; O	CTD C	1.40/1.45	Commuted sum for maintenance required £TBC Playing field stakeholder - sports clubs
Green Infrastructure:		CMO v*	CMO v*	CMO	СМО					CMO Y*	y · · ·			D; CIVIO; O	£TBC	by10/by15	*** contributions towards green infrastructure from non BL dev £TBC
Strategic open space	γ*	γ	γ~	Y	Υ	Υ				γ*			D; S&C	D		by10/by15	*Includes country park
Local open space / play space	Y	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ			D; S&C	D	£12.3m	by10/by15	
																	Includes Council Leisure Centre upgrade / reprovision & Museum upgrade / reprovision
Community Facilities:											· ***		S&C				*** contributions towards green infrastructure from non BL dev £TBC
community racindes.											У		Jac				Estimated floorspace & cost for onsite GP provision.
																	Assumes NHS does not have existing GP capacity nearby
Health sq. m est floorspace provided																	Contributions to offsite HCT & hospital provision TBC
onsite	394	573	358	299	263	181	139	105	87	549		2049	D; S&C	D; O	£7.6m	by10/by15	Delivery stakeholder NHS
onsite	394	5/3	338	299	203	101	159	105	87	549		2948	D; S&C	D; U	E7.0III	DV10/DV12	
																	Multi function community buildings and land are encouraged which is likely to
			1								1			I			require multi stakeholder working for delivery & funding.
OIL	.,	.,	l,	l,	l,	<u>,</u>	.	.,	L,	.,	1	1			542.2		Proposals may consider joint use of education grounds or premises where
Other community provision	Y	Y	Y	Y	Y	Y	Y	Y	Υ	Y			D; S&C O	D; O; HCC	£12.3m	by10/by15	appropriate
N. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.														-	1	-	Factorial of Communication (Communication)
Neighbourhood Centre / Local Centre											1			L		l	Estimated net floorspace required at ground floor.
sq. m est net floorspace at groundfloor	990	1440	900	750	660					1380		6120	D; S&C	υ		by10/by15	Provision of centres may require land at nil value
															1		
					1								1		1		
SUDS	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Y	Υ		D; S&C	D	£TBC	by10/by15	
Energy Strategy / Renewable energy	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	γ*		D; S&C	D	£61.5m	by10/by15	Y* 50 or more dwellings / 1000 sqm or more non-resi
	γ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ	Υ		D	D; O; HCC	£TBC	by10/by15	Delivery stakeholder to include communications providers
Digital Infrastructure																	
Digital Infrastructure NOTES:																	
	ucture reco	irements >	and does no	t provide a	full list of a	schemes	See IDP for	more informa	ition Roth	DP & IDS ~	re 'live' do:	uments whi	ch shall be unde	ted at appropri	ate intervals	as & whon first	her information becomes available



GJO/alc 8 March 2018

Mr Chris Briggs, Spatial Planning Manager, St Albans City and District Council, St Peters Street, St Albans, AL1 3JE



Helioslough Limited 258 Bath Road Slough SL1 4DX United Kingdom

Telephone: +44 (0)1753 537171 SEGRO.com

Dear Mr Briggs,

Re: Radlett - Strategic Rail Freight Interchange - Planning permission reference 5/2009/0708

I am aware that the responses to the Call for Sites (Local Plan 2018 Consultation) will be used to inform the content of the new Local Plan and it is in this context that I am writing to you.

I understand that following the Call for Sites process Hertfordshire County Council has put forward a number of their landholdings.

One of the landholdings (the former Radlett Airfield) is part of the overall site which has been granted planning permission by the Secretary of State for a Strategic Rail Freight Interchange (SRFI). Hertfordshire County Council is looking to promote it for housing.

As I am sure you will appreciate the decision by the Secretary of State to grant planning permission on this Green Belt land was not taken lightly and was subject to a legal challenge that failed.

The Secretary of State granted planning permission because the application related to the provision of nationally significant infrastructure in the form of a SRFI. It has been long established government policy to promote this type of strategic infrastructure development. This was given increased emphasis in the NPS for National Networks, which states that there is a compelling need for an expanded network of SRFIs (Para 2.56).

The site characteristics required for this form of development are very specific and during the planning determination process a comprehensive review of all alternative sites was carried out.

The Secretary of State concluded that the SRFI is a form of development that satisfies the very special circumstances required to justify the removal of the land from the Green Belt. In reaching this conclusion, he states in Para 53 of the 2014 decision-letter that: "the factors weighing in favour of the appeal include the need for SRFIs to serve London and the South East, to which he has attributed very considerable weight and the lack of more appropriate locations in the north west sector which would cause less harm to the Green Belt".

Whilst I recognise that the provision of housing is important I would point out that this type of development can be carried out across a range of locations and does not have the same site specific requirements as a SRFI.

To allocate this site as a location suitable for housing would frustrate the long held government policy to encourage the development of a network of SRFI facilities. The current position is that it is the only site with planning permission that could serve the crucial London market.

Our advice is that the Council would need to have extremely strong justification to allocate the site for housing where both exceptional circumstances are needed to amend the Green Belt boundary and to make the allocation would frustrate a development for which very special circumstances have been shown to exist. In the absence of such justification, the plan could not be found sound. Pursuit of a draft plan that was inherently unsound would



expose the Council to considerably increased risks of Government intervention in its renewed local plan-making process from the very beginning.

I would respectfully ask that you and your colleagues take full account of this position when arriving at the preferred ranking for the Green Belt sites to be brought forward to address the housing needs of the District and accordingly that you do not pursue a possible allocation of the site for housing.

Yours sincerely

Gareth Osporn
Director – Helioslough Limited

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21 May 2018

By email and post

Ms Tracy Harvey Chief Planning Officer St Albans City and District Council St Peters Street St Albans A11 3JE Our ref Matter ref C2/GALLIMOM//6902796

1U0475/000015

Dear Ms Harvey

RADLETT - STRATEGIC RAIL FREIGHT INTERCHANGE PLANNING PERMISSION REFERENCE 5/2009/0708

We write further to our client's (Helioslough Ltd's) letter to the Spatial Planning Manager, dated 8 March 2018, which is attached as an appendix to your report to the 22 May 2018 Planning Policy Committee. The report describes the draft outcome of the strategic site selections following the Call for Sites selection.

1. ASSESSMENT OF FORMER RADLETT AERODROME SITE

Appendix 3 of your report sets out the site assessment forms including an assessment of the Former Radlett Aerodrome site against the 8 criteria agreed at the March PPC meeting for assessing potential strategic housing sites. We note that the overall evaluation is in the amber and not red category, and thus it is proposed to progress it for consideration at the meeting on 22 May and at the presentations on 23 and 24 May.

2. **NEED FOR SRFI**

We have reviewed the Radlett Aerodrome assessment and reached the conclusion that it is fundamentally flawed as a planning appraisal because it gives no weight to the decision or reasoning of the Secretary of State to grant permission for the development of an SRFI to serve London and the South East. Although the permission is mentioned in the assessment, this is under the section dealing with impacts on the purposes of the Green Belt, which appears to seek to compare the Secretary of State's assessment of the impact of the SRFI on the Green Belt with your assessment of the impact of 2,300 houses. However, as highlighted in our client's earlier letter, the Secretary of State's decision to grant planning permission was made due to the national importance of making provision for SRFI's and absence of alternative sites to meet the important identified need for SRFI's in the South East of the country and in particular the NW sector (an area covering a large part of London and the south east). As you are aware with the recent approval of Reserved Matters on the site the SRFI is being actively pursued.

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Ms Tracy Harvey

In these circumstances where the Secretary of State has determined that there is a national need to release the site from the Green Belt to develop an SRFI, any consideration of the "suitability" of the site for housing development (section 2 of the evaluation) must consider and evaluate fully all of the implications of allocating the site for housing and the incompatibility with the Secretary of State's decision if such an allocation is pursued. The evaluation which has been carried out by the Council contains no such analysis. The evaluation treats housing and SRFI's as effectively comparable land uses whereas one (the SRFI) has demanding site location criteria which make it not "footloose" and the other (housing) is in relative terms easier to accommodate in a variety of locations. This is a fundamental issue which is effectively ignored in the planning appraisal.

We note that the Committee report at paragraph 3.4 sets out various factors which may be relevant to the allocation of housing sites. One of the factors is "unique contribution to other infrastructure provision or community benefits". In that context it is clear that the evaluation of the site should have included a comparative assessment of the ways in which a housing allocation would contribute to infrastructure provision or community benefits as against how the approved SRFI would achieve such contributions. The Secretary of State has very clearly addressed the contributions which the SRFI would make in the decision letter granting permission for that scheme.

DELIVERABILITY

A further issue which the site evaluation fails to address in any meaningful way is the question of the ownership of the site and thus the deliverability of the site for housing. Whilst there is a statement "the site assessed includes additional land not submitted as part of the HCC Former Radlett Airfield submission" there is no explicit acknowledgement that a significant part of the site is neither owned nor controlled by HCC. This raises a fundamental question over HCC's ability to secure control of the entire site and thus over the deliverability of a housing development, which are vital issues when the Council determines the appropriateness of the site for a housing allocation.

4. SOUNDNESS TESTS FOR THE LOCAL PLAN

Our client's earlier letter drew to your attention the obvious difficulties of the Local Plan passing the soundness tests if a housing allocation were pursued at the former Radlett Aerodrome. The appendix to your committee report demonstrates that any such claim to soundness would have to rely on ignoring the Secretary of State's decision and reasoning about the need to develop an SRFI on the site. In such circumstances, we consider that there is no realistic possibility of the Local Plan being found sound in the face of the manifest availability of a variety of alternative sites on which to accommodate housing. We reiterate our client's request that you should not pursue the allocation of the site for housing any further.

If the Council continues with a Local Plan process which involves this site as a proposed housing allocation our client will be forced to consider all potential remedies including a possible legal challenge to that process and its outcome.

Ms Tracy Harvey

Please let me know if you have any questions in relation to any of the issues set out in this letter or in relation to the matter as a whole.

Yours sincerely



Michael Gallimore
Partner
michael.gallimore@hoganlovells.com
D 0207 050 3400

cc Chris Briggs, Spatial Planning Manager Charles Turner, Legal Department



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24 May 2018

By email and post

Ms Tracy Harvey Chief Planning Officer St Albans City and District Council St Peters Street St Albans A11 3JE Our ref Matter ref C2/GALLIMOM//6902796

1U0475/000015

Dear Ms Harvey

RADLETT - STRATEGIC RAIL FREIGHT INTERCHANGE PLANNING PERMISSION REFERENCE 5/2009/0708

I refer to my letter dated 21 May which was sent by email and post.

I am disappointed not to have received a response to that letter. I am also concerned that the letter was not drawn to the attention of Members at the meeting of the Planning Policy Committee on 22 May.

Further representations will be submitted to you on these issues in advance of the Committee meeting on 11 June and we will be requesting that they are drawn to the attention of the Committee prior to or at that meeting.

I look forward to hearing from you in response.

Yours sincerely



Michael Gallimore
Partner
michael.gallimore@hoganlovells.com
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cc Chris Briggs, Spatial Planning Manager Charles Turner, Legal Department

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30 May 2018

By email and post

Ms Tracy Harvey
Chief Planning Officer
St Albans City and District Council
St Peters Street
St Albans
A11 3JE

Our ref Matter ref C2/GALLIMOM//6902796 1U0475/000015

Dear Ms Harvey

RADLETT - STRATEGIC RAIL FREIGHT INTERCHANGE PLANNING PERMISSION REFERENCE 5/2009/0708

I refer to my previous correspondence regarding the above site in the context of the proposed housing allocations in the Local Plan. This matter is due to be considered further at a meeting of the Planning Policy Committee on 11 June. The following issues are all highly relevant to any consideration of the appropriateness to allocate the Former Radlett Aerodrome site for housing. Will you please confirm that all of these issues will be drawn to the attention of the Committee either prior to or at the meeting on 11 June:

- The assessment of the Radlett Aerodrome site in terms of its appropriateness for a housing allocation which has been carried out to date by the Council is fundamentally flawed because it gives no weight to the decision or reasoning of the Secretary of State to grant planning permission for the development of the site as an SRFI to serve London and the South East.
- The decision by the Secretary of State was made due to the national importance of making provision for SRFI's and the absence of alternative sites to meet the important need for SRFI's in the South East of the country and in particular the North West sector (an area covering a large part of London and the South East).
- 3. The SRFI is being actively pursued, as evidenced by the recent approval of Reserved Matters on the site.
- 4. Any consideration of the "suitability" of the site for housing development must consider and evaluate fully all of the implications of allocating the site for housing and the incompatibility of such an allocation with the Secretary of State's decision if such an allocation is pursued. The evaluation carried out by the Council to date contains no such analysis. The evaluation which has been carried out treats housing and SRFI's as effectively comparable land uses, which is clearly not a sound approach. The SRFI has demanding site location criteria which make it not "footloose" whilst housing is in relative terms easier to accommodate in a variety of locations.

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- 5. The evaluation of the site should have included a comparative assessment of the ways in which a housing allocation would contribute to infrastructure provision or community benefits as against how the approved SRFI would achieve such contributions. The Secretary of State has very clearly addressed the contributions which the SRFI would make in the decision letter granting permission for that scheme.
- 6. Deliverability of sites allocated for housing should be an integral element of the Council's approach to the decision on housing allocations. To date, there has been no acknowledgement that a significant part of the site is neither owned nor controlled by HCC. This raises a fundamental question over HCC's ability to secure control of the entire site and thus over the deliverability of a housing development.

In ignoring all of the above issues and taking a decision to allocate the site for housing the Council would be making a decision which is not sustainable. In these circumstances we reiterate our previous comment that we consider there is no realistic possibility of the Local Plan being found sound in the face of the manifest availability of a variety of sites on which to accommodate housing.

Accordingly, we repeat our request that the Council should not pursue the allocation of the site for housing any further. We also repeat our client's position that if the Council continues with a Local Plan process which includes this site as a proposed housing allocation our client will be forced to consider all potential remedies including a possible legal challenge to that process and its outcome.

I would be grateful if you would acknowledge receipt of this letter and send the confirmation requested in the first paragraph of the letter.

Yours sincerely



Michael Gallimore
Partner
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D 0207 050 3400

cc Chris Briggs, Spatial Planning Manager Charles Turner, Legal Department



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30 May 2018

By email and post

Mr Chris Briggs Spatial Planning Manager St Albans City and District Council St Peters Street St Albans A11 3JE Our ref C2/GALLIMOM//6902796 Matter ref 1U0475/000015

Dear Mr Briggs

RADLETT - STRATEGIC RAIL FREIGHT INTERCHANGE PLANNING PERMISSION REFERENCE 5/2009/0708

I refer to my recent correspondence with Tracy Harvey on the above site.

At the meeting of the Planning Policy Committee on 22 May you made various comments to the Committee under agenda item 11 dealing with the "Indicative new draft Local Plan for Publication (Regulation 19 stage) Consultation". Included in those comments was a statement in relation to the 'conditional allocation' of Park Street Garden Village. You stated that:

"After legal advice, this allocation will be the subject of a fresh re-evaluation following the gathering of evidence on the relative merits and importance of delivering the site either for housing or the Strategic Rail Freight Interchange, for which it was found that there was a national need. The re-evaluation will include looking at alternative strategies which would deliver the identified housing elsewhere including options such as identifying a Housing Target for Neighbourhood Plan areas."

I copied to you my letter to Tracy Harvey dated 21 May in which we set out a number of issues which are highly relevant to the "re-evaluation" to which you referred in your statement. As noted in my letter of 24 May to Tracy Harvey we will be submitting further representations before the Committee meeting on 11 June.

I would be grateful for your confirmation that:

(a) All of our representations submitted on this issue will be fully taken into account as part of the "re-evaluation" which you are carrying out, and

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(b) All of our representations will be reported to the Committee meeting on 11 June.

With regard to the "re-evaluation" exercise can you please confirm when you anticipate that this will be conducted and when you anticipate that the results will be available.

I look forward to hearing from you.

Yours sincerely



Michael Gallimore
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cc Tracy Harvey, Chief Planning Officer Charles Turner, Legal Department



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10 July 2018

By email and post

Our ref Matter ref C2/GALLIMOM//6973170 1U0475/000015

Ms Tracy Harvey Chief Planning Officer St Albans City and District Council St Peters Street St Albans A11 3JE

Dear Ms Harvey

RADLETT - STRATEGIC RAIL FREIGHT INTERCHANGE PLANNING PERMISSION **REFERENCE 5/2009/0708**

We refer to our previous correspondence in relation to the above site in the context of the Council's Local Plan process. For ease, we attach copies of our letters to you dated 21 May, 24 May and 30 May.

We have not received a satisfactory answer to the points raised in those letters. In particular, the Council has not provided a satisfactory response to the points raised in Section 2 of our letter dated 21 May regarding the "Need for SRFI" and the Council's approach to the evaluation of the former Radlett aerodrome site for housing and an SRFI, where it has treated both uses as effectively comparable land uses ignoring the fact that an SRFI has demanding site location criteria which make it "not footloose" whilst housing is in relative terms easier to accommodate in This is a fundamental issue which the Council has continued to ignore in a variety of locations. its planning appraisal and in the discussions at the various recent committee meetings.

As we have stated in our earlier correspondence, in these circumstances, we do not consider that there is any realistic possibility of the Local Plan being found sound. As we have also previously stated, if the Council continues with a Local Plan process which includes the former Radlett aerodrome site as a proposed housing allocation, our client will be forced to consider all potential remedies including a possible legal challenge to that process and its outcome.

We will be grateful if you would draw this letter and the earlier enclosed correspondence to the attention of the full Council at its meeting on 11 July.

Yours sincerely

Michael Gaillinole

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cc Chris Briggs, Spatial Planning Manager, Charles Turner, Legal Department

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M6Q19 Appendix 1

This is the latest in a series of letters from Hogan Lovells relating to the Park Street Garden Village Broad Location in the draft Local Plan. The previous letters, dated 21 May, 24 May and 31 May were published with PPC Agendas in May 2018 and June 2018. They were also referenced (through PPC references) in the 21 June 2018 Cabinet Agenda.

The substance of the letters was also addressed in detail reports to PPC in May and June 2018 and similarly referenced (through PPC references) in the 21 June 2018 Cabinet Agenda.

All these references also form part of the papers available for Council.

This new letter dated 10 July does not raise any new matter for consideration.

The letter raises specifically:

In particular, the Council has not provided a satisfactory response to the points raised in Section 2 of our letter dated 21 May regarding the "Need for SRFI" and the Council's approach to the evaluation of the former Radlett aerodrome site for housing and an SRFI, where it has treated both uses as effectively comparable land uses ignoring the fact that an SRFI has demanding site location criteria which make it "not footloose" whilst housing is in relative terms easier to accommodate in a variety of locations. This is a fundamental issue which the Council has continued to ignore in its planning appraisal and in the discussions at the various recent committee meetings.

This is incorrect. The Council has not ignored the issue. The issue was in particular acknowledged and addressed in the 12 June 2018 PPC Report:

"Draft Local Plan for Publication (Regulation 19 stage) consultation - recommendation to June Cabinet" Appendix 1 "Draft Park Street Broad Location - re-evaluation following the gathering of evidence on the relative merits of housing and the SRFI as well as alternative strategies which would deliver the identified housing elsewhere".

The Appendix explicitly addresses the issue of the 'demanding site criteria' for SRFIs at several points. This includes, in section 2 "Existing planning permission for SFRI" it sets out, quoting the Inspector's report:

However, other considerations including, particularly the need for SRFIs to serve London and the South East and the lack of more appropriate alternative locations for an SRFI in the north west sector...

It then quotes the Secretary of State's decision:

The Secretary of State observes that the Written Ministerial Statement of 29 November 2011 makes clear that there remains a need for a network of SRFIs to support growth and create employment and that it has proved extremely problematical, especially in the South East, to create appropriately located SRFIs.

. .

However, he tends to the view that this only serves to reinforce the point made in the 2011 Written Ministerial Statement on Strategic Rail Freight Interchanges that, in the South East in particular, it is proving extremely problematical to develop SRFIs.

In Section 3 "The National Networks National Policy Statement (NPS) 2014" it sets out, quoting the NPS:

M6Q19 Appendix 1

There is a particular challenge in expanding rail freight interchanges serving London and the South East.

In the final Section "The Re-evaluation" it further addresses these issues, firstly:

In order to justify the loss of the SRFI opportunity, however, it is also necessary to consider whether it is appropriate (taking into account other considerations, like Green Belt considerations) to find another location for the housing development in order to allow the SRFI to be provided. Full account must be taken of the effect of not providing a nationally significant infrastructure proposal like the SRFI, should a housing strategy that prevents such development be selected.

Secondly, quoting the Inspector and the Secretary of State and explicitly acknowledging the issues:

Other alternative locations for an SRFI

The Inspector concluded (13.119):

However, other considerations including, particularly the need for SRFIs to serve London and the South East and the lack of more appropriate alternative locations for an SRFI in the north west sector......

The Secretary of State concluded:

"The Secretary of State has had regard to the Inspector's comment at IR13.34 that, as the Council accepted in evidence, the need for SRFIs is stated and restated in a number of documents. The Secretary of State observes that the Written Ministerial Statement of 29 November 2011 makes clear that there remains a need for a network of SRFIs to support growth and create employment and that it has proved extremely problematical, especially in the South East, to create appropriately located SRFIs. The SRFI Policy Guidance published on 29 November 2011 states that only one SRFI had been granted planning consent in the whole of the South East region and advises that SRFI capacity needs to be provided at a wide range of locations, particularly but not exclusively serving London and the South East. The Secretary of State has had regard to the comment made by STRIFE (letter of 4 March 2014) that the proposed SRFI at Howbury Park has not been delivered. However, he tends to the view that this only serves to reinforce the point made in the 2011 Written Ministerial Statement on Strategic Rail Freight Interchanges that, in the South East in particular, it is proving extremely problematical to develop SRFIs."

The Council fully acknowledges these issues and potential benefits of an identified site.

The Council has clearly not ignored the issue of the 'demanding site criteria' for SRFIs.

<u>Draft Park Street Broad Location - re-evaluation following the gathering of evidence on the relative merits of housing and the SRFI as well as alternative strategies which would deliver the identified housing elsewhere</u>

Key Context

There is a large body of contextual material related to this issue. This includes:

1 - NPPF

The NPPF is relevant in a variety of ways. Key relevant paragraphs include:

Paragraph 182

A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- Positively prepared the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Paragraph 162

Local planning authorities should work with other authorities and providers to:

 take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

Paragraph 31

Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.

2 - Existing planning permission for SFRI

In summary, outline planning permission was granted by the Secretary of State for a Strategic Rail Freight Interchange (SRFI) on 14 July 2014 (LPA reference 5/2009/0708). This outline planning permission agreed the principle of the rail freight development in this location, together with the means of access, siting of the development and landscaping scheme. The decision is available at http://www.stalbans.gov.uk/Images/SP_Railfreight_DCLG_Letter_CGMS_14July2014 http://www.stalbans.gov.uk/Images/SP_Railfreight_DCLG_Letter_CGMS_14July2014 https://www.stalbans.gov.uk/Images/SP_Railfreight_DCLG_Letter_CGMS_14July2014 https://www.stalbans.gov.uk/Images/SP_Railfreight_DCLG_Letter_CGMS_14July2014 https://www.stalbans.gov.uk/Images/SP_Railfreight_DCLG_Letter_CGMS_14July2014 https://www.stalbans.gov.uk/Images/SP_Railfreight_DCLG_Letter_CGMS_14July2014 https://www.stalbans.gov.uk/Images/SP_Railfreight_DCLG_Letter_CGMS_14July2014 https://www.stalbans.gov.uk/Images/SP_Railfreight_DCLG_Letter_CGMS_14July2014

Details of the main SRFI application, and subsequent applications, can be found at http://www.stalbans.gov.uk/planning/rail_freight_interchange.aspx.

St Albans District Council (SADC) refused planning permission for a SFRI on 21 July 2009. Helioslough Ltd. appealed against this decision and a Public Inquiry was held in November and December 2009 (Inspector's decision - http://www.stalbans.gov.uk/Images/Appeal%20Decision%202010%20Mead_tcm15-64085.pdf). This culminated in a decision by the Secretary of State, dated 7 July 2010, to dismiss the appeal.

Helioslough challenged the Secretary of State's July 2010 decision in the High Court. On 1 July 2011, a High Court Judge quashed the decision on the basis of one of four grounds of challenge put forward by Helioslough. SADC was a second defendant in the case. The Judge found that the Secretary of State did not properly explain his reasons for disagreeing with the Planning Inspector's recommendation that the proposed development be allowed.

The High Court referred the matter back to the Secretary of State to re-determine.

The Secretary of State invited all parties to the planning appeal, including the Council, to make further written representations. The Council made its further representations on 14 October 2011.

In a letter dated 29 March 2012, the Secretary of State informed all parties to the appeal that he had decided to delay his decision. He invited further written representations on the relevance of the recently published National Planning Policy Framework. The Council provided its representations on 16 April 2012.

The Secretary of State wrote to the Council in a letter dated 19 September 2012 to seek views on a proposal to re-open the Radlett inquiry. He proposed to join it with a planned inquiry into a proposed strategic rail freight terminal at Colnbrook near Slough. Interested parties were asked to give their views by 3 October 2012.

In a letter dated 14 December 2012, the Department for Communities and Local Government said that he had decided not to re-open the inquiry.

In a letter of 20 December 2012 the Secretary of State said that he was "minded to approve" planning permission for the proposed interchange, subject to various conditions.

In its letters of 18 January 2013, the Council requested that the Secretary of State reconsider his decision not to re-open the Radlett inquiry and conjoin it with the Colnbrook inquiry. The Council also gave notice of its intention to challenge the decision not to reopen and conjoin the inquiry through judicial review in the High Court if the Secretary of State did not meet the Council's request.

The Council applied for Judicial Review of the Secretary of State's decision. Permission to proceed was refused by the High Court in an order issued 14 June 2013.

The Council lodged a claim to in the High Court challenging the Secretary of State's decision to grant planning permission, however, this was rejected 13 March 2015. The Council applied to the Court of Appeal for permission to appeal the dismissal, however this was refused 29 June 2015.

Three Reserved Matters applications have subsequently been approved, subject to conditions by SADC. A number of conditions remain outstanding. See section 7 below.

The Planning Inspector and Secretary of State's decisions should be read as a whole. The decisions however included the following aspects.

The Inspector stated in paragraphs 13.110 and 13.111 that:

"So far as benefits are concerned, those more locally site specific include ... a country park, the improvements to footpaths and bridleways and the provision of the bypass to Park Street and Frogmore. The Secretary of State previously attached "some weight" to the predicted reduction on CO2 emissions identified in the Environmental Statement. I have no reason to disagree with that conclusion. Some weight was also afforded by the Secretary of State to the numbers of people who would work at the SRFI, albeit not necessarily living close to the site.

On a general basis, there is no dispute about the need for an SRFI. It is stated and restated in a number of documents and encouraged in PPG13 (paragraph 45). Government policies have consistently supported shifting freight from road to rail. SRA Policy (2004) suggests that 3 or 4 new SRFIs could serve London and the South East located where key road and rail radials intersect the M25. The indication in the SRA Policy that 400,000m2 of rail connected warehousing floorspace would be needed in the South East by 2015 does not constitute a target or a ceiling. In the previous decision in 2008, the Secretary of State concluded that the need for SRFIs to serve London and the South East was a material consideration of very considerable weight. No new SRFIs have been developed since the earlier decision. Therefore, the weight has not diminished."

The Inspector concluded in paragraphs 13.118 and 13.119:

"Accordingly, I conclude that the proposal would constitute inappropriate development in the Green Belt which, in itself, would cause significant harm to which substantial weight should be attached. Harm would also be caused to the Green Belt because of a loss of openness, significant encroachment into the countryside and

the contribution to urban sprawl. There would be an adverse effect on the setting of St Albans, although the Secretary of State concluded previously that only limited weight should be attached to this. Harm would also arise from the adverse effects on landscape and ecology. Therefore, the proposal would conflict with Policies 1, 104 and 106 of the adopted Local Plan Review.

13.119 However, other considerations including, particularly the need for SRFIs to serve London and the South East and the lack of more appropriate alternative locations for an SRFI in the north west sector which would cause less harm to the Green Belt, together with the local benefits of the proposals for a country park, improvements to footpath and bridleways in the immediate area and the provision of the Park Street and Frogmore bypass, lead me to conclude that very special circumstances exist in this case which outweigh the conflict with the development plan and therefore the appeal should be allowed subject to conditions..."

The Secretary of State concluded that (Decision Letter extracts):

"The Secretary of State has had regard to the Inspector's comment at IR13.34 that, as the Council accepted in evidence, the need for SRFIs is stated and restated in a number of documents. The Secretary of State observes that the Written Ministerial Statement of 29 November 2011 makes clear that there remains a need for a network of SRFIs to support growth and create employment and that it has proved extremely problematical, especially in the South East, to create appropriately located SRFIs. The SRFI Policy Guidance published on 29 November 2011 states that only one SRFI had been granted planning consent in the whole of the South East region and advises that SRFI capacity needs to be provided at a wide range of locations, particularly but not exclusively serving London and the South East. The Secretary of State has had regard to the comment made by STRIFE (letter of 4 March 2014) that the proposed SRFI at Howbury Park has not been delivered. However, he tends to the view that this only serves to reinforce the point made in the 2011 Written Ministerial Statement on Strategic Rail Freight Interchanges that, in the South East in particular, it is proving extremely problematical to develop SRFIs."

"the factors weighing in favour of the appeal include the need for SRFIs to serve London and the South East...the lack of more appropriate alternative locations for an SRFI in the north west sector which would cause less harm to the Green Belt...the local benefits of the proposals for a country park, improvements to footpaths and bridleways and the Park Street and Frogmore bypass".

"that these considerations, taken together, clearly outweigh the harm to the Green Belt and the other harms he has identified including the harm in relation to landscape and ecology and amount to very special circumstances."

3 - The National Networks National Policy Statement (NPS) 2014

The NPS is relevant in a variety of ways. Key relevant paragraphs include:

Purpose and scope

- 1.1 The National Networks National Policy Statement (NN NPS), hereafter referred to as 'NPS', sets out the need for, and Government's policies to deliver, development of nationally significant infrastructure projects (NSIPs) on the national road and rail networks in England. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State. The thresholds for nationally significant road, rail and strategic rail freight infrastructure projects are defined in the Planning Act 2008 ("the Planning Act") as amended (for highway and railway projects) by The Highway and Railway (Nationally Significant Infrastructure Project) Order 2013 ("the Threshold Order"). For the purposes of this NPS these developments are referred to as national road, rail and strategic rail freight interchange developments.
- 1.3 Where a development does not meet the current requirements for a nationally significant infrastructure project set out in the Planning Act (as amended by the Threshold Order), but is considered to be nationally significant, there is a power in the Planning Act for the Secretary of State, on application, to direct that a development should be treated as a nationally significant infrastructure project. In these circumstances any application for development consent would need to be considered in accordance with this NPS. The relevant development plan is also likely to be an important and relevant matter especially in respect of establishing the need for the development.
- 1.4 In England, this NPS may also be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 or any successor legislation. Whether, and to what extent, this NPS is a material consideration, will be judged on a case by case basis.
- 1.6 The policy set out in this NPS on strategic rail freight interchanges confirms the policy set out in the policy guidance published in 2011. Designation of this NPS means that the 2011 guidance is cancelled.

Consistency of NPS with the National Planning Policy Framework

- 1.17 The overall strategic aims of the National Planning Policy Framework (NPPF) and the NPS are consistent, however, the two have differing but equally important roles to play.
- 1.18 The NPPF provides a framework upon which local authorities can construct local plans to bring forward developments, and the NPPF would be a material consideration in planning decisions for such developments under the Town and Country Planning Act 1990. An important function of the NPPF is to embed the principles of sustainable development within local plans prepared under it. The NPPF is also likely to be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project.
- 1.19 However, the NPPF makes clear that it is not intended to contain specific policies for NSIPs where quite particular considerations can apply. The National

Networks NPS will assume that function and provide transport policy which will guide individual development brought under it.

Summary of need

- 2.2 There is a critical need to improve the national networks to address road congestion and crowding on the railways to provide safe, expeditious and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth. Improvements may also be required to address the impact of the national networks on quality of life and environmental factors.
- 2.6 There is also a need for development on the national networks to support national and local economic growth and regeneration, particularly in the most disadvantaged areas. Improved and new transport links can facilitate economic growth by bringing businesses closer to their workers, their markets and each other. This can help rebalance the economy.
- 2.10 The Government has therefore concluded that at a strategic level there is a compelling need for development of the national networks both as individual networks and as an integrated system. The Examining Authority and the Secretary of State should therefore start their assessment of applications for infrastructure covered by this NPS on that basis.

The need for development of strategic rail freight interchanges / Importance of strategic rail freight interchanges / Rail freight growth

2.50 While the forecasts in themselves, do not provide sufficient granularity to allow site-specific need cases to be demonstrated, they confirm the need for an expanded network of large SRFIs across the regions to accommodate the long-term growth in rail freight. They also indicate that new rail freight interchanges, especially in areas poorly served by such facilities at present, are likely to attract substantial business, generally new to rail.

Environmental

2.51 The environmental advantages of rail freight have already been noted at paragraph 2.40 and 2.41 Nevertheless, for developments such as SRFIs, it is likely that there will be local impacts in terms of land use and increased road and rail movements, and it is important for the environmental impacts at these locations to be minimised.

UK economy, national and local benefits – jobs and growth

2.52 SRFIs can provide considerable benefits for the local economy. For example, because many of the on-site functions of major distribution operations are relatively labour-intensive this can create many new job opportunities and contribute to the enhancement of people's skills and use of technology, with wider longer term benefits to the economy. The availability of a suitable workforce will therefore be an important consideration.

- 2.54 To facilitate this modal transfer, a network of SRFIs is needed across the regions, to serve regional, sub-regional and cross-regional markets. In all cases it is essential that these have good connectivity with both the road and rail networks, in particular the strategic rail freight network (see maps at Annex C). The enhanced connectivity provided by a network of SRFIs should, in turn, provide improved trading links with our European neighbours and improved international connectivity and enhanced port growth.
- 2.56 The Government has concluded that there is a compelling need for an expanded network of SRFIs. It is important that SRFIs are located near the business markets they will serve major urban centres, or groups of centres and are linked to key supply chain routes. Given the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites.
- 2.57 Existing operational SRFIs and other intermodal RFIs are situated predominantly in the Midlands and the North. Conversely, in London and the South East, away from the deep-sea ports, most intermodal RFI and rail-connected warehousing is on a small scale and/or poorly located in relation to the main urban areas.
- 2.58 This means that SRFI capacity needs to be provided at a wide range of locations, to provide the flexibility needed to match the changing demands of the market, possibly with traffic moving from existing RFI to new larger facilities. There is a particular challenge in expanding rail freight interchanges serving London and the South East.

4 - Nationally Significant Infrastructure Project (NSIP) regime; national infrastructure status of the SRFI

The SRFI appears to fall within the definition of a "rail freight interchange" as defined by the Planning Act 2008, section 26 (the area of the SRFI is at least 60 hectares in size, will be part of the national railway network and be capable of handling 4 trains a day for multiple consignees). As a result, the SRFI would have been, if at the consenting stage, an NSIP.

The final NPS was not published at the time of the SoS decision on the SRFI, but the Secretary of State's comments on the need for the SRFI to serve London and the South East mean that the SRFI is "nationally significant" for the purposes of paragraph 162 of the NPPF.

While there is an argument that the comments in the NPPF on "nationally significant infrastructure" are only meant to address projects which have gone through the consenting process or which meet the definition of an NSI project, that is an unduly restrictive approach. It is correct to treat the SRFI permission as equivalent to an NSI project both because it meets the definition of an NSI under the Planning Act and because of the Secretary of State's observations when permitting the scheme (see paras. 31 and 44 of the decision letter). In any event, under para. 162, the NPPF

requires consideration of "the need for strategic infrastructure" (which the SRFI obviously is) whether or not it is NSI.

This means that the "positively prepared" part of the definition of soundness at NPPF paragraph 182 is engaged in respect of the SRFI.

Delivery of infrastructure which satisfies the definition of NSI, or is objectively to be regarded as nationally significant (which this is because of the Secretary of State's conclusions on the project), is consequently relevant to the Local Plan process. As a generality (and subject to other imperatives, which are dealt with below), in order to be positively prepared the Local Plan strategy should seek to facilitate the SRFI. Having been identified as a project which meets a national objective, the NPPF indicates that this development should, in general terms, be facilitated.

5 - May 2018 PPC Local Plan Reports

Extracts from May 2018 PPC Local Plan Reports:

The reports are available in full at:

http://stalbans.moderngov.co.uk/ieListDocuments.aspx?Cld=459&Mld=8516&Ver=4)

Former Radlett Aerodrome Ref. PS-607 Strategic Site Evaluation Form

Green Belt Review evaluation (RAG)

An independent Green Belt Review was carried out in 2013. The site falls in parcel GB30. The Review concludes

"The overall contribution of GB30 towards Green Belt purposes is:

- To check the unrestricted sprawl of large built-up areas limited or no
- To prevent neighbouring towns from merging partial
- To assist in safeguarding the countryside from encroachment significant
- To preserve the setting and special character of historic towns significant
- To maintain existing settlement pattern significant

The parcel does not fully separate neighbouring 1st tier settlements however it contributes (with GB26, 27, 28 & 29) to the strategic gap between St Albans and Watford (Abbots Langley) to the south of the study area. This gap is 4.8km and contains the settlements of Chiswell Green, How Wood, Bricket Wood, Park Street / Frogmore and Radlett Road. Therefore any reduction in the gap would have a limited impact on the overall separation of 1st tier settlements in physical or visual terms but would have a greater impact on the separation of 2nd tier settlements and local levels of visual openness.

The parcel displays some typical rural and countryside characteristics but also accommodates significant recreational land uses including Sopwell parkland and Verulam golf course in the north. Beyond this arable fields are bound by hedgerows with pasture frequently close to the watercourses. The parcel is also contains the

well restored mineral workings (Radlett Airfield). The main urban influences are the M25 and A414 which dissect the site. Both are well concealed in the landscape, but highly audibly intrusive. Land to the north of Sopwell acts as a green wedge into St Albans. There is limited built development and settlement boundaries are generally strong meaning the urban fringe is well connected to the wider countryside. However there is ribbon development along the Radlett Road south of Park Street / Frogmore to Colney Street industrial park. The countryside landscape is generally open in character with limited tree and hedgerow cover. The parcel contains Sopwell Conservation area. Most significantly it also provides open and historic setting to the Cathedral and Abbey Church of St Alban providing views to and from the countryside.

The parcel provides the primary local gap between St Albans and Park Street/Frogmore (2nd). The narrow gap is 0.4km and contains the A414 which is well integrated into the landscape. Landscape features and planting enhance the perception of the gap and lessen the urban influence arising from the proximity of settlements and the road. Any reduction would be likely to compromise the separation of settlements in physical and visual terms, and overall visual openness. The gap from Park Street / Frogmore (2nd) to Radlett Road (3rd) Colney Street industrial area is very limited due to ribbon development along the Radlett Road."

Assessment has been undertaken on the basis of a limited development area south of the A414, informed by the parcel assessment above. The wider parcel performs a range of Green Belt functions and there would be some impacts. A partial development of the parcel only below the A414 could however be undertaken in a way that reduces such impacts. Exact boundaries will be set out through the Local Plan/masterplanning process.

The parcel contributes, together with GB26, 27, 28 and 29, to the strategic gap between St Albans and Watford, however the gap would remain at 4.8km and the development of the site would have a limited impact on the overall separation of these settlements.

The whole submitted site has strong physical boundaries by way of the A414 dual carriageway to the north, the Midland Mainline to the east, the M25 to the south and the existing built up area of Park Street to the west. These boundaries considerably assist in containing the Green Belt impact of any development within the site.

AMBER

Existing significant permission

Outline planning permission was granted by the Secretary of State for a Strategic Rail Freight Interchange (SRFI) on 14/07/2014 (LPA reference 5/2009/0708). Three Reserved Matters applications have been submitted to the LPA and are awaiting determination.

Exact boundaries will be set out through the Local Plan/masterplanning process. The footprint of any built development would likely be located in a broadly similar position to the built development proposed as part of the SRFI. The impact of 2,500 homes

would likely have a broadly similar impact as the permitted 331,665 sq.m. of warehousing.

It is recognised that the Secretary of State has determined that "the factors weighing in favour of the appeal include the need for SRFIs to serve London and the South East...the lack of more appropriate alternative locations for an SRFI in the north west sector which would cause less harm to the Green Belt...the local benefits of the proposals for a country park, improvements to footpaths and bridleways and the Park Street and Frogmore bypass". The Secretary of State considered "that these considerations, taken together, clearly outweigh the harm to the Green Belt and the other harms he has identified including the harm in relation to landscape and ecology and amount to very special circumstances." The site is however a strategic scale site that has (very largely) been put forward as part of a Call for Sites. For the reasons above there is no change to the rating of the site.

AMBER

NB: The site assessed includes additional land not submitted as part of the HCC Former Radlett Airfield submission.

<u>May 2018 PPC – Indicative new draft Local Plan for Publication (Regulation 19 stage) consultation</u>

- 3.2 Following legal advice, further work is required on the evidence base which will necessitate re-evaluation of the approach and strategy for housing development. The draft plan attached to this report should be considered as a working draft and will be subject to change / modification.
- 4.16 The committee will note that the working draft Local Plan at Appendix 1 contains 11 Broad Locations. These consist of all 8 of the Green rated sites from the draft Strategic Site Selection process (report on this Agenda). Officers have come to the initial draft conclusion that the advantages of 2 of the included sites (Hemel Hempstead North and South East Hemel Hempstead), as identified, are greater than that of the excluded site. In relation to the Park Street Garden Village Broad Location, this is a conditional allocation. After legal advice, this allocation will be the subject of a fresh re-evaluation following the gathering of evidence on the relative merits and importance of delivering the site either for housing or the Strategic Rail Freight Interchange, for which it was found that there was a national need. This re-evaluation will include looking at alternative strategies which would deliver the identified housing elsewhere including options such as identifying a Housing Target for Neighbourhood Plan areas.

May 2018 PPC – Local Plan – Draft Strategic Site Selection Evaluation Outcomes

4.13 As agreed at the March meeting of PPC, developers of the sites scoring an overall evaluation of Green or Amber will be invited to present their schemes. These presentations will be considered by an Evaluation Validation panel. This will comprise the Chair of PPC and up to 3 Councillors selected from PPC. This is due to take place on 23 May and 24 May 2018.

6 - SEGRO / Hogan Lovells letters (4 letters)

Hogan Lovells have written to SADC on behalf of SEGRO. Letters dated 21, 24, 30 May (2 letters) are attached to June 2018 PPC agenda. An earlier letter from SEGRO (dated 8 March 2018) was included in the May 2018 PPC agenda.

Extracts below explain the SFRI promoter's (SEGRO) view that the Radlett Airfield site should not be considered as a potential Local Plan housing site:

NEED FOR SRFI

We have reviewed the Radlett Aerodrome assessment and reached the conclusion that it is fundamentally flawed as a planning appraisal because it gives no weight to the decision or reasoning of the Secretary of State to grant permission for the development of an SRFI to serve London and the South East. Although the permission is mentioned in the assessment, this is under the section dealing with impacts on the purposes of the Green Belt, which appears to seek to compare the Secretary of State's assessment of the impact of the SRFI on the Green Belt with your assessment of the impact of 2,300 houses. However, as highlighted in our client's earlier letter, the Secretary of State's decision to grant planning permission was made due to the national importance of making provision for SRFI's and absence of alternative sites to meet the important identified need for SRFI's in the South East of the country and in particular the NW sector (an area covering a large part of London and the south east). As you are aware with the recent approval of Reserved Matters on the site the SRFI is being actively pursued.

In these circumstances where the Secretary of State has determined that there is a national need to release the site from the Green Belt to develop an SRFI, any consideration of the "suitability" of the site for housing development (section 2 of the evaluation) must consider and evaluate fully all of the implications of allocating the site for housing and the incompatibility with the Secretary of State's decision if such an allocation is pursued. The evaluation which has been carried out by the Council contains no such analysis. The evaluation treats housing and SRFI's as effectively comparable land uses whereas one (the SRFI) has demanding site location criteria which make it not "footloose" and the other (housing) is in relative terms easier to accommodate in a variety of locations. This is a fundamental issue which is effectively ignored in the planning appraisal.

We note that the Committee report at paragraph 3.4 sets out various factors which may be relevant to the allocation of housing sites. One of the factors is "unique contribution to other infrastructure provision or community benefits". In that context it is clear that the evaluation of the site should have included a comparative assessment of the ways in which a housing allocation would contribute to infrastructure provision or community benefits as against how the approved SRFI would achieve such contributions. The Secretary of State has very clearly addressed the contributions which the SRFI would make in the decision letter granting permission for that scheme.

DELIVERABILITY

A further issue which the site evaluation fails to address in any meaningful way is the question of the ownership of the site and thus the deliverability of the site for housing. Whilst there is a statement "the site assessed includes additional land not submitted as part of the HCC Former Radlett Airfield submission" there is no explicit acknowledgement that a significant part of the site is neither owned nor controlled by HCC. This raises a fundamental question over HCC's ability to secure control of the entire site and thus over the deliverability of a housing development, which are vital issues when the Council determines the appropriateness of the site for a housing allocation.

SOUNDNESS TESTS FOR THE LOCAL PLAN

Our client's earlier letter drew to your attention the obvious difficulties of the Local Plan passing the soundness tests if a housing allocation were pursued at the former Radlett Aerodrome. The appendix to your committee report demonstrates that any such claim to soundness would have to rely on ignoring the Secretary of State's decision and reasoning about the need to develop an SRFI on the site. In such circumstances, we consider that there is no realistic possibility of the Local Plan being found sound in the face of the manifest availability of a variety of alternative sites on which to accommodate housing. We reiterate our client's request that you should not pursue the allocation of the site for housing any further.

If the Council continues with a Local Plan process which involves this site as a proposed housing allocation our client will be forced to consider all potential remedies including a possible legal challenge to that process and its outcome.

The Council acknowledges this analysis. It has been taken into account in this reevaluation.

7- Reserved Matters and Discharge of Conditions applications

Helioslough are actively progressing the SRFI development.

Three Reserved Matters applications were approved by SADC's Planning Referrals Committee, subject to conditions, 14 May 2018. The three applications are:

- 5/2016/3006 Development, i.e. buildings, intermodal, car parks, internal roads.
- 5/2017/1938 Infrastructure, i.e. the bypass, northern gateway, southern access and rail chord.
- 5/2017/1995 Landscaping, i.e. details approved as specified in Condition 15.

The committee agenda and minutes of the meeting can be viewed at: http://stalbans.moderngov.co.uk/ieListMeetings.aspx?Cld=169&Year=0

All conditions relating to both the outline permission and the reserved matters permission need to be discharged. Further details can be found here.

8 - Hertfordshire County Council's position – as publically available

Hertfordshire County Council, the landowner for the majority of the SRFI site, submitted the site to SADC's 2017 and 2018 'Call for sites'.

The 2017 submission (viewable at http://stalbans-consult.limehouse.co.uk/file/4700082) stated:

"This site has outline planning permission for a Strategic Rail Freight Interchange (SFRI). If the site is not required for this use the County Council could make this site available to meet the growth needs of the District, particularly housing. It is considered that the site is large enough to accommodate a Garden Village, which could include housing and employment along with the infrastructure to support the community, including schools."

The 2018 submission (viewable at http://stalbans-consult.limehouse.co.uk/file/4915834 and http://stalbans-consult.limehouse.co.uk/file/4915835) includes the Cabinet's recommendation of 19 February 2018 which summarises HCC's current position:

"Cabinet agreed that:-

- i) the County Council supports the promotion of the eight sites referred to in the report through the Local Plan process to assist St Albans City and District Council in achieving its housing and employment land requirements; and
- ii) the inclusion of the Former Radlett Airfield in this process is authorised to enable the site to be considered by St Albans City and District Council for inclusion in the Local Plan for housing rather than a strategic rail freight interchange."

HCC have discussed the future of the site, and the complex issues entailed, at various meetings. These include:

- Cabinet 19 February 2018 Item 11- 'St Albans City and District Council Local Plan Call for Sites Consultation (Jan/Feb 2018)' (Cabinet report can be viewed here and Landowner Representations Document can be viewed here).
- Cabinet 11 July 2016 Item 4 'Former Radlett Airfield To receive 'expressions of interest' and to consider the next steps regarding the submissions' (relevant documents can be viewed here).
- Cabinet 14 December 2015 Item 12 'To consider the resolutions of County Council on November 2015 regarding the Former Radlett Aerodrome' (relevant documents can be viewed here).
- County Council 10 November 2015 Item 4a –Petition relating to the Former Radlett Aerodrome (relevant documents can be viewed <u>here</u>).

- Cabinet and Policy, Resources and Transformation Cabinet Panel 9
 December 2013 Item 3 North Orbital Road Upper Colne Valley –
 Helioslough Ltd: To consider letters from the Department for Communities and Local Government; and the consider the future of the land at the Former Radlett Aerodrome (relevant documents can be viewed here).
- Cabinet 21 October 2013 Item 5 North Orbital Road Upper Colne Valley –
 Helioslough Ltd: Process progress report (Cabinet report can be viewed here,
 minutes can be viewed here).
- Resources and Performance Cabinet Panel 4 July 2016 Item 5 'Former Radlett Aerodrome site' (relevant documents can be viewed <u>here</u>).

N.B. Committee records only available online from May 2013

The public position of Hertfordshire County Council's Leaders throughout the process is illustrated through the following quotes:

David Williams, the current Leader of Hertfordshire County Council, said in a press release dated 19 February 2018 (viewable here):

"We've always said that we'd prefer the Radlett airfield site to remain as Green Belt and that we'd rather not sell it, but we recognise that we need to build 90,000 new homes in the county over the next 15 years and some 13,700 of those will need to be in the St Albans district.

That's why it makes sense for us to offer up this land, which we own, as a possible site for a Garden Village with 2,000 new homes and the infrastructure to support them. We know that developers are interested in this idea and we feel it could be an alternative to using the land for a Strategic Rail Freight Interchange.

Along with the other land we're putting forward, this will make a significant contribution towards providing the new homes that our county will need to support a growing population and an increase in local jobs."

In July 2016, the then Leader of the County Council, Robert Gordon, was reported (article available here) to have said:

"Our prime duty is to the residents of Hertfordshire, and we remain opposed to the proposed development of a SFRI on the county council's land at the former Radlett airfield.

We would prefer not to see a change in the current green belt status of this land and would also prefer not to sell it. However, it is possible that circumstances might arise where we have no lawful alternative but to sell."

The Re-evaluation

Purpose of this re-evaluation

As has been dealt with above, in general terms the NPPF requires that the local plan should seek to facilitate the SRFI.

However, the NPPF also requires the Local Plan to seek to provide land for the objectively assessed development needs of other forms of development in a local authority's area, including housing. Consequently there are often tensions in planmaking between seeking to meet varying needs, the limited environmental resources to accommodate those various requirements and competing priorities. This is made clear by the wording in paragraph 182 of the NPPF, first bullet, when it is stated that the authority should "seek" to meet the relevant needs "where it is reasonable to do so and consistent with achieving sustainable development". There is, as is indicated in a number of policy documents and assessments, a need to provide housing in within the Council's area and to protect the Green Belt.

In this instance, therefore the Council must weigh up the loss of the benefits associated with the SRFI (including national need for SRFIs as indicated in national policy, the provision of a country park and other less significant matters) against the benefits of delivering housing (and other less significant matters) on the site.

In order to justify the loss of the SRFI opportunity, however, it is also necessary to consider whether it is appropriate (taking into account other considerations, like Green Belt considerations) to find another location for the housing development in order to allow the SRFI to be provided. Full account must be taken of the effect of not providing a nationally significant infrastructure proposal like the SRFI, should a housing strategy that prevents such development be selected.

The Council is required, therefore, to consider whether the effect of delivering housing on an alternative site or sites, along with the benefit of delivering the SRFI comprises a preferable and more appropriate strategy to a proposal that delivers housing on the SFRI site and prevents delivery of the SFRI.

Benefits of SRFI

Extracts from Planning Inspector's decision:

13.110 So far as benefits are concerned, those more locally site specific include ... a country park, the improvements to footpaths and bridleways and the provision of the bypass to Park Street and Frogmore. The Secretary of State previously attached "some weight" to the predicted reduction on CO2 emissions identified in the Environmental Statement. I have no reason to disagree with that conclusion. Some weight was also afforded by the Secretary of State to the numbers of people who would work at the SRFI, albeit not necessarily living close to the site.

13.111 On a general basis, there is no dispute about the need for an SRFI. It is stated and restated in a number of documents and encouraged in PPG13 (paragraph 45). Government policies have consistently supported shifting freight from road to rail. SRA Policy (2004) suggests that 3 or 4 new SRFIs could serve London and the South East located where key road and rail radials intersect the M25. The indication in the SRA Policy that 400,000m2 of rail connected warehousing

floorspace would be needed in the South East by 2015 does not constitute a target or a ceiling. In the previous decision in 2008, the Secretary of State concluded that the need for SRFIs to serve London and the South East was a material consideration of very considerable weight. No new SRFIs have been developed since the earlier decision. Therefore, the weight has not diminished."

13.118 Accordingly, I conclude that the proposal would constitute inappropriate development in the Green Belt which, in itself, would cause significant harm to which substantial weight should be attached. Harm would also be caused to the Green Belt because of a loss of openness, significant encroachment into the countryside and the contribution to urban sprawl. There would be an adverse effect on the setting of St Albans, although the Secretary of State concluded previously that only limited weight should be attached to this. Harm would also arise from the adverse effects on landscape and ecology. Therefore, the proposal would conflict with Policies 1, 104 and 106 of the adopted Local Plan Review.

13.119 However, other considerations including, particularly the need for SRFIs to serve London and the South East and the lack of more appropriate alternative locations for an SRFI in the north west sector which would cause less harm to the Green Belt, together with the local benefits of the proposals for a country park, improvements to footpath and bridleways in the immediate area and the provision of the Park Street and Frogmore bypass, lead me to conclude that very special circumstances exist in this case which outweigh the conflict with the development plan and therefore the appeal should be allowed subject to conditions..."

Extracts from Secretary of State's decision:

53. The Secretary of State considers that the factors weighing in favour of the appeal include the need for SRFIs to serve London and the South East...the lack of more appropriate alternative locations for an SRFI in the north west sector which would cause less harm to the Green Belt...the local benefits of the proposals for a country park, improvements to footpaths and bridleways and the Park Street and Frogmore bypass. The Secretary of State considers that these considerations, taken together, clearly outweigh the harm to the Green Belt and the other harms he has identified including the harm in relation to landscape and ecology and amount to very special circumstances."

The Council fully acknowledges these potential benefits.

Benefits of Housing

National policy has long recognised the benefits of provision of new housing development. However, new housing development is now recognised by Government as a particular pressing national need.

Extracts from the Housing White Paper 'Fixing our broken housing market':

I want to fix this broken market so that housing is more affordable and people have the security they need to plan for the future. The starting point is to build more homes...We need to build many more houses, of the type people want to live in, in the places they want to live.
(Prime Minister foreword)

This country doesn't have enough homes...That has to change. We need radical, lasting reform that will get more homes built right now and for many years to come. (Secretary of State foreword)

The housing market in this country is broken, and the cause is very simple: for too long, we haven't built enough homes. Since the 1970s, there have been on average 160,000 new homes each year in England. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under-supply.

Extract from NPPF revision consultation March 2018:

60 To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. (Para 61introduces the proposed standard method for assessing need)

Extract from Prime Minister's speech on making housing fairer: 5 March 2018:

...But we cannot fulfil that dream, we cannot bring about the kind of society I want to see, unless we tackle one of the biggest barriers to social mobility we face today: the national housing crisis.

The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.

The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places...

Deliverability / developability of the site for housing

The deliverability of the site has been questioned by Helioslough / SEGRO. The SFRI proposal and the planning process it went through itself demonstrates that the site can in principle be developed, including with suitable road access. The only questioning of this appears to be on the basis of the separate ownership of a relatively small proportion of the land required, including for some of the proposed SRFI accesses. There is no reason to suppose this land cannot be made available through normal negotiation / land transactions / statutory processes in the timeframes indicated in the draft Local Plan. The NPPF sets the test very clearly at paragraph 47 footnote 12 as:

To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

The draft Local Plan sets that point in time as first housing completions in approximately 2026-2027.

Alternative housing development strategy options and effects of different strategies tested against the current proposed strategy

Currently, other strategy options are:-

1) North East Redbourn – Amber rated

This site/alternative strategy option would not deliver the equivalent quantum of housing development required within the Plan period. Thus a simple substitution of this site for the former Radlett Airfield option could not satisfy the NPPF requirement to meet objectively assessed development needs. As an alternative site, it would also not generate as many other significant benefits as those identified in association with the Park Street Garden Village. Details are in the reports considered by PPC in May 2018 and at this meeting.

2) Using Red rated sites

This site/alternative strategy option would result in a significantly greater damaging impact on the Green Belt. It would therefore be directly contrary to the NPPF requirement to protect Green Belt wherever possible. The Council needs to show that, where a release is proposed, site specific exceptional circumstances can be demonstrated. Overall this requires that impacts on Green Belt purposes are minimised. It is not reasonable or practical to investigate every possible permutation of theoretical community / other 'benefits' from every permutation of one or more of over 50 alternative 'Red' rated sites. However, it is highly likely that – given the unique locational situation in terms of sustainable transport improvements (Abbey Line in particular) – alternative 'Red' sites would also not generate as many other significant benefits as those identified in association with the Park Street Garden Village. Details are in the reports considered by PPC in May 2018 and at this meeting.

3) Different delivery trajectories

The trajectories for current Broad Locations in the draft Local Plan have been informed by industry knowledge and discussions with an extensive variety of informed and interested parties. They set out a reasonable approach to timescales. The NPPF requirement is for a realistic approach to delivery within the Plan period. The only way that differing the trajectory could provide sufficient land for the homes required within the Plan period would be to adopt what are considered to be unrealistic delivery timetables for North Hemel and East Hemel South. The likely outcome would be failure to meet the NPPF 'standard method' number of 913 homes per annum.

Details are in the reports considered by PPC in May 2018 and at this meeting.

4) Other LPAs delivering development

As set out in the main report at this meeting.

Duty to Cooperate discussions with adjoining and nearby authorities show no reasonable prospect of the District's housing need being met elsewhere at this point in time. Work with adjoining and nearby authorities is ongoing. Statutory and NPPF mechanisms do not allow reliance on development beyond District / Plan boundaries.

5) Neighbourhood Plans

There have been seven Neighbourhood Plan area designations in the District. The Harpenden and Harpenden Rural Neighbourhood Plan is currently at Regulation 16 'publicising a Plan Proposal' stage. Discussions with Neighbourhood Plan bodies show no reasonable prospect of significant additional elements of the District's housing need being met through Neighbourhood Plans at this point in time. Work with Neighbourhood Plan bodies is ongoing. The Council also currently has no power to ensure additional housing development would be delivered through Neighbourhood Plans, as they are voluntary in nature. The statutory provisions for neighbourhood plans and NPPF policies do not envisage reliance on future, uncertain, delivery of housing by this method. Additionally, any neighbourhood plan processes would encounter the same Green Belt purposes impacts as the Local Plan and may well fail to demonstrate exceptional circumstances for release of Green Belt.

6) Development of a number of smaller sites currently in the Green Belt

This option is a variant on 2) and fails against the same NPPF requirements. Identification of sufficient smaller sites would unacceptably spread the adverse impacts of development on Green Belt purposes. It would also prevent the Plan maximising the infrastructure and community benefits that will arise only from larger scale urban extensions. The Local Plan Development Strategy clearly sets out to achieve a range of socio – economic benefits and this arises particularly from larger sites that are likely to provide a range of services and facilities that will benefit the whole community, not just new residents.

The options overall

In all the options set out above it would be possible for the Council to prepare a Local Plan that had no impact on the SRFI site as a result of inclusion of a housing site, or sites, with similar capacity to the former Radlett Airfield (SFRI site).

However it is clear that such an alternative housing strategies 1-3 and 5 / 6 would significantly increase overall Green Belt loss and would do so on sites where there are greater site specific adverse impacts on Green Belt purposes. Only option 4 with its potential to divert housing development beyond the Green Belt might possibly avoid this outcome.

Overall, these alternative housing development strategy options need to be considered in three ways:

First; are there better alternative housing strategies with currently identified sites that would completely avoid any need to consider use of the Radlett Airfield SFRI site?

There are no such strategies because the Council's comprehensive Green Belt Review and call for sites / site selection process has only identified a very limited number of Amber rated sites. There is insufficient capacity in these sites to entirely replace the option of using the former Radlett Airfield site. The NPPF requires exceptional circumstances for release of Green Belt and the circumstances must be site specific.

Second; following from the above, are there alternative strategies based on a combination of currently identified sites and other newly identified sites (i.e. sites more damaging to Green Belt purposes, or diversion of development outside the District to areas beyond the Green Belt)?

Such a strategy cannot be put in place because there is no mechanism available to the Council to bring forward non Green Belt Sites outside the District and to use site more damaging to Green Belt would not satisfy the NPPF requirement for site specific exceptional circumstances to justify release.

Third; is a site combination (achieved on the basis of either of the first and second points above) that allows both the SFRI to go ahead and the Plan to achieve its housing requirement / target, more appropriate, on balance, than an option that prevents the SFRI proceeding?

This is the consideration underlying the conclusions of this re-evaluation.

Other alternative locations for an SRFI

The Inspector concluded (13.119):

However, other considerations including, particularly the need for SRFIs to serve London and the South East and the lack of more appropriate alternative locations for an SRFI in the north west sector......

The Secretary of State concluded:

"The Secretary of State has had regard to the Inspector's comment at IR13.34 that, as the Council accepted in evidence, the need for SRFIs is stated and restated in a number of documents. The Secretary of State observes that the Written Ministerial Statement of 29 November 2011 makes clear that there remains a need for a network of SRFIs to support growth and create employment and that it has proved extremely problematical, especially in the South East, to create appropriately located SRFIs. The SRFI Policy Guidance published on 29 November 2011 states that only one SRFI had been granted planning consent in the whole of the South East region and advises that SRFI capacity needs to be provided at a wide range of locations,

particularly but not exclusively serving London and the South East. The Secretary of State has had regard to the comment made by STRIFE (letter of 4 March 2014) that the proposed SRFI at Howbury Park has not been delivered. However, he tends to the view that this only serves to reinforce the point made in the 2011 Written Ministerial Statement on Strategic Rail Freight Interchanges that, in the South East in particular, it is proving extremely problematical to develop SRFIs."

The Council fully acknowledges these issues and potential benefits of an identified site.

Key issue – At a point in time

This re-evaluation is appropriate for this point in time. It will be revisited as time and the situation progresses. Assessment and judgments for these issues are timesensitive and there is significant potential for revision. This is in particular given the high likelihood that the new NPPF Update will be published in June/July 2018.

The Local Plan Regulation 19 formal consultation stage itself is yet to come. This stage and consideration of representations made at this stage will be an important matter for the Council in deciding on progress towards submission.

Parties including SEGRO/Helioslough, the Government, the Railfreight industry, HCC etc. will be fully able to respond to that consultation and we welcome their formal feedback at that stage.

Conclusion

Overall, at this time, the current view of officers is that the draft Broad Location for Park Street Garden Village is the most appropriate response to the evidence available. This will be kept under ongoing review, in particular in the light of responses to the Regulation 19 Local Plan formal consultation.

<u>Draft Park Street Broad Location – Review of the re-evaluation following the gathering of evidence on the relative merits of housing and the SRFI as well as alternative strategies which would deliver the identified housing elsewhere (March 2019)</u>

As set out in the main report and addressed at PPC in June 2018, the committee will note that the draft Local Plan contains 11 Broad Locations. In relation to the Park Street Garden Village Broad Location, after legal advice, this allocation was the subject of a re-evaluation following the gathering of evidence on the relative merits and importance of delivering the site either for housing or the Strategic Rail Freight Interchange, for which it was found that there was a national need. This re-evaluation included looking at alternative strategies which would deliver the identified housing elsewhere including options such as identifying a Housing Target for Neighbourhood Plan areas. This re-evaluation set out:

Key issue – At a point in time

This re-evaluation is appropriate for this point in time. It will be revisited as time and the situation progresses. Assessment and judgments for these issues are timesensitive and there is significant potential for revision. This is in particular given the high likelihood that the new NPPF Update will be published in June/July 2018.

The Regulation 19 formal consultation stage itself is yet to come. This stage and consideration of representations made at this stage will be an important matter for the Council in deciding on progress towards submission.

Parties including SEGRO, the Government, the Railfreight industry, HCC etc. will be fully able to respond to that consultation and we welcome their formal feedback at that stage.

. . .

Conclusion

Overall, at this time, the current view of officers is that the draft Broad Location for Park Street Garden Village is the most appropriate response to the evidence available. This will be kept under ongoing review, in particular in the light of responses to the Regulation 19 Local Plan formal consultation.

The re-evaluation considered at June 2018 PPC (and Cabinet and Council thereafter) has been further reviewed in the light of more recent considerations (March 2019). These considerations have included: correspondence reported to Cabinet and Council in June and July 2018, the LP regulation 19 Publication consultation responses (reported elsewhere on the Agenda), further Sustainability Appraisal work (see Appendix 2) and the NPPF 2018 and 2019 revisions. Of particular note is the updated text in the NPPF (2018 and 2019) relating to interchanges for rail freight. Paragraph 104 sets out:

Planning policies should:

. . .

- e) provide for any large scale transport facilities that need to be located in the area42, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements;
- 42 Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services.

There have also been a number of other related matters where circumstances have moved on – for example the 'making' of the Harpenden Neighbourhood Plan in February 2019 and the fact that there have been a further number of conditions discharged in relation to the permitted Strategic Rail Freight Interchange (SRFI).

Regulation 19 Representations by RPS on behalf of Helioslough Ltd

These are set out in 4 sections and with two Appendices. They can be concisely addressed as follows.

1 – Strategic Rail Freight Interchange

The benefits of an SRFI were fully acknowledged in the Re-evaluation. The challenge of finding alternative sites was also fully acknowledged in the Re-evaluation. The information referred to at Appendix A is acknowledged.

2 - Park Street Garden Village

The challenge to the approach taken in the SA/SEA with regard to the Park Street Garden Village is misconceived. The Site Selection and Local Plan processes fully acknowledged the consequences of not providing the SRFI. The SA/SEA looked at the likely effects of development for housing, with the 'alternatives' of Park Street Garden Village vs Strategic Rail Freight Interchange having been taken into account at a different step – the evaluative stage. For example, the Strategic Site Selection Evaluation Outcomes report sets out explicitly:

Existing significant permission

Outline planning permission was granted by the Secretary of State for a Strategic Rail Freight Interchange (SRFI) on 14/07/2014 (LPA reference 5/2009/0708). Three Reserved Matters applications have been submitted to the LPA and are awaiting determination.

. . .

It is recognised that the Secretary of State has determined that "the factors weighing in favour of the appeal include the need for SRFIs to serve London and the South East...the lack of more appropriate alternative locations for an SRFI in the north west sector which would cause less harm to the Green Belt...the local benefits of the proposals for a country park, improvements to footpaths and bridleways and the Park Street and Frogmore bypass".

The re-evaluation explicitly related to "the relative merits of housing and the SRFI".

Nonetheless, in order to provide PPC, Cabinet and interested parties with a comparative assessment in the SA/SEA format for understanding, this assessment has now been carried out. This assessment is included in the updated draft SA/SEA (see Appendix 2).

3 - Site Evaluation Process

The challenge to the approach taken in the Strategic Site Selection process with regard to the Park Street Garden Village is misconceived. It misunderstands the process that was undertaken (and is made explicit) in the Strategic Site Selection work. Most particularly it mistakes the assessment of 'parcels' and that of 'sites'. It is entirely logical that, in some instances, as the assessment sets out, some of 'most significant' parcels contain some Green or Amber rated sites; and conversely that some of the 'least important' parcels do not contain Green or Amber rated sites.

4 – Housing Need

The 'Standard Methodology' has more recently been confirmed by the Government, based on the 2014 household projections.

Appendix A – see comment under section (1) above

Appendix B – noted

Conclusion

This further review does not alter the overall view of officers that the draft Broad Location for Park Street Garden Village is the most appropriate response to the evidence available.



St Albans Local Plan

Submission

Sustainability Appraisal Report Addendum

DRAFT

March 2019



St Albans Local Plan Submission

Sustainability Appraisal Report Addendum March 2019

Disclaimer

DRAFT

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Appendices

Appendix A:	St Albans	Publication	Local Plan	n: SA/SEA R	epresentations

Appendix B: Screening of Minor Modifications to Local Plan

Appendix C: Assessment of potential Strategic Rail Freight Interchange (SRFI)

Appendix D: Update to the information in the SA Report (September 2018)

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1 Introduction

1.1 Background to Sustainability Appraisal/Strategic Environmental Assessment

This Sustainability Appraisal Report Addendum has been prepared to report on the sustainability appraisal activities that have been undertaken from the representation on the Publication Local Plan in September/October 2018, up to the Submission of the Local Plan and associated documents to the Secretary of State. The report covers four main areas:

- Analysis and responses to the representations made during the consultation on the Publication Local Plan and its accompanying sustainability appraisal;
- Assessment of proposed Minor Modifications to the Local Plan;
- Assessment of the proposed Strategic Rail Freight Interchange and
- Updates to the information in the SA Report (September 2018).

This report does not repeat information provided in the Publication SA Report (September 2018) and should therefore be read alongside that earlier report. Both this SA Report Addendum and the Publication SA Report will form part of the portfolio of Local Plan Submission Documents.

1.2 Stages of SA/SEA

The key stages of the SA/SEA process are broadly presented in Table 1-1. For purposes of completeness this table includes all the work undertaken on the Core Strategy, Strategic Local Plan and new Local Plan. The stages and documents associated with the work on the new Local Plan are shown in **bold italic** text. The stages that will need to be completed prior to the adoption of the Local Plan are also shown.

The documents produced (see Table 1-1) are available to download at URL:

http://www.stalbans.gov.uk/planning/Planningpolicy/local-plan.aspx

Table 1-1: Stages in the SA/SEA and St Albans Local Plan

Local Plan	SA/SEA Stages	SA documents/outputs and Dates
Begin document preparation	Stage A: Setting the context, establishing the baseline and deciding on the scope.	SA Scoping Report, prepared February 2006. Consultation on Scoping Report February 2006.
	A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.	Consultation on the scope of the SA/SEA April 2018
	A2: Collecting baseline information. A3: Identifying sustainability issues. A4: Developing the SA framework. A5: Consulting on the scope of the SA (Scoping Report).	
Consultation on Issues and Options (2006 & 2007) and Emerging Core Strategy (2009) Develop Spatial Strategy Options and Consultation on the Strategy for Locating Future Development in the District (2010) Local Plan Issues and Options consultation January 2018	Stage B: Developing and refining options and assessing of effects. B1: Testing the Local Plan objectives against the SA framework. B2: Developing the Local Plan options including reasonable alternatives. B3: Evaluate the likely effects of the Local Plan and alternatives. B4: Considering ways of mitigating adverse effects and maximising beneficial effects. B5: Proposing measures to monitor the significant effects of implementing the Local Plan.	Issues & Options SA Working Note Oct 2006. Consultation on further Issues and Options July 2007 with accompanying SA Working Paper. Consultation on the Emerging Core Strategy in August 2009 with accompanying SA Working Note (June 2009). Preparation of SA Working Note for Spatial Strategy Options (September 2010) Consultation on the Strategy for Locating Future Development in the District (December 2010) with accompanying SA Working Note. Preparation of SA Working Note for Issues and Options consultation (January 2018) Preparation of SA Working Note to assess alternatives for housing growth levels and broad locations (May 2018)
		Preparation of SA Working Note for Council (June 2018)
Draft Pre- submission Document	Stage C: Preparing the Sustainability Appraisal Report. C1: Preparing the SA Report .	Preparation of SA Report for the Draft Pre- Submission Strategic Local Plan November 2012 (not published).
Strategic Local Plan (SLP) Options Consultation on Draft SLP (2014)	Further consideration of options (Stages B2-B4)	Preparation of SA Working Note for Development Strategy Options, Housing Requirement/Target Options; and Strategic Sub- Area Options (June 2014)
Publication of Pre- submission Document for SLP	Stage C: Preparing the Sustainability Appraisal Report.	Preparation of SA Report for the Publication Strategic Local Plan December 2015.
(2015) Publication of Pre-submission	C1: Preparing the SA Report .	SA Report Addendum (July 2016) Preparation of SA Report for the Publication Local Plan (this report) September 2018
Document for Local Plan (September 2018)	Stage D: Seek representations on the SA Report from consultation bodies and the public	Consultation on the Publication SA Report for the SLP (2016) Consultation on the Publication SA Report for the Local Plan (2018)
Submission of Local Plan to Secretary of State		Preparation of SA Report Addendum for the Submission stage (this Addendum), March 2019.
Examination	Consultation on any major modifications arising from the Examination (if required)	Update to the SA Report if required to assess and report on implications of any major modifications
Adoption of the Local Plan	Stage E: Post adoption reporting and monitoring E1: Prepare and publish post-adoption statement E2: Monitor significant effects of implementing the Local Plan. E2: Responding to adverse effects.	To be completed when the Local Plan is adopted.

 $^{^{\}rm 1}\,{\rm This}$ is the Environmental Report that is required by the SEA Regulations.

2 Pre-Submission Representations

2.1 Introduction

Section 2.4 of the SA Report (September 2018) provides a summary of all the SA related consultation activities which were carried out prior to the Regulation 19 consultation in September 2018.

This section of the SA Report Addendum adds to that summary by providing information on the representations on the SA Report that were received during the consultation at the Regulation 19 stage, undertaken from 4th September to 17th October 2018.

Amongst the large number of representations received during the consultation some were directly or indirectly related to the Sustainability Appraisal. These SA related representations were made by statutory consultees and other public bodies; landowners/developers; community groups; and individual members of the public.

Details of the representations received and the responses to these representations are provided in Appendix A to this SA Report Addendum.

None of the representations have resulted in major changes being made to the information or findings that were included in the Publication SA Report (September 2018). However the representations have resulted in a few minor updates to the assessments for the some of the Broad Locations. These are detailed in Appendix D to this Addendum and summarised in Section 5.

3 Assessment of the proposed amendments to the Local Plan

3.1 Introduction

The Council have proposed a limited number of 'Minor Modifications' to the Local Plan which will be considered by the Inspector during the Examination. In addition there have been some minor corrections made to the text of the Local Plan. It is necessary to consider whether any of these changes could affect the findings of the original sustainability appraisal and therefore a screening assessment has been undertaken to fulfil this requirement. This process has also considered the implications for the Habitats Regulations Assessment.

3.2 Screening assessment findings

Each of the proposed Minor Modifications and corrections has been assessed to determine whether their inclusion in the Local Plan would have any implications for the previous findings of the sustainability appraisal, as documented in the SA Report (September 2018), or the Habitats Regulations Assessment, as documented in the HRA Screening Update (September 2018). In particular, the assessment considered whether there would be any new significant effects, or changes to significant effects previously identified. The detailed results of this assessment are provided in Appendix B, with the main findings summarised below.

[FINDINGS TO FOLLOW]

3.3 Implications for the Habitats Regulations Assessment

[FINDINGS TO FOLLOW]

4 Consideration of alternatives

During the process to develop the Local Plan there has been extensive and detailed consideration of options and reasonable alternatives. Whilst the SA has informed the process it is not the purpose of the SA to decide the alternative to be chosen for the Local Plan, nor is it the role of the SA to determine what is and what isn't a 'reasonable alternative' – those are both decisions to be made by the plan-making authority.

Representations made during the consultation on the Publication Local Plan questioned why the SA had not taken into consideration the fact that the site for the proposed Park Street Garden Village (PSGV) has an extant planning permission for use as a Strategic Rail Freight Interchange (SRFI).

The view of the Council is that the SRFI is not a 'reasonable alternative' for that site and therefore it was not assessed in the SA. However for purposes of completeness the principle of developing an SRFI on the same site as that allocated for PSGV has now been assessed as part of this SA Report Addendum.

The details of the assessment, along with the rationale and assumptions made for the assessment, are provided in Appendix C. The key differences in the assessment findings are summarised in Table 4-1.

Table 4-1: Comparison of predicted effects for PSGV and SRFI

SA Objective	Comparison of effects
1. Biodiversity	Both PSGV and SRFI will result in some habitat loss, but also some enhancements relating to proposed Country Parks.
2 Water quality/ quantity	No predicted effects for either PSGV or SRFI.
3. Flood risk	Both PSGV and SRFI will be able to avoid having built development in the flood risk zone.
4. Soils	Both PSGV and SRFI would result in soil sealing from new development.
5. Greenhouse gas emissions Significant positive effects have been identified for PSGV due of non-car based transport improvements that the developm required to deliver.	
	Significant positive effects have been identified for SRFI as moving freight from road onto rail will result in an overall reduction in CO_2 emissions from fright operations.
	Minor adverse effects were identified for both PSGV and SRFI in relation to the increased vehicle activity that would result.
6. Climate change proof	No predicted effects for either PSGV or SRFI.
7. Air quality	Minor positive effects have been identified for PSGV due to the range of non- car based transport improvements that the development would be required to deliver.
	Minor positive effects have been identified for SRFI, as moving freight from road onto rail will result in an overall reduction in airborne emissions at a regional level.
	Minor adverse effects were identified for both PSGV and SRFI in relation to the increased vehicle activity that would result.
8. Use of brownfield sites	The majority of the site area is not classified as previously developed land. Minor adverse effects have therefore been predicted for PSGV and SRFI.
9. Resource efficiency	Minor positive effects have been identified for both PSGV and SRFI in relation to their respective proposals for sustainable developments.

10. Historic environment	Both PSGV and SRFI have the potential to have minor adverse effects on the same set of heritage assets and have therefore been assessed to have the same effects.	
11. Landscape & Townscape	Both PSGV and SRFI have the potential to have minor adverse effects on landscape at this open site and have therefore been assessed to have the same effects. However the creation of Country Parks has resulted in minor positive effects also being identified for both.	
12. Health	Minor positive effects have been identified for both PSGV and SRFI due to their proposed Country Parks and increased opportunities for walking and cycling.	
	Uncertainty relating to noise has been identified for both sites, but for different reasons. For PSGV it relates to the potential effects on new residents from noise from the M25, whilst for SRFI it relates to the potential for noise being generated from the SRFI to have effects on nearby residents.	
13. Sustainable locations	Minor positive effects have been predicted for PSGV and SRFI.	
14. Equality & social	Minor positive effects have been predicted for PSGV.	
inclusion	No predicted effects for SRFI.	
15. Good quality housing	Significant positive effects have been identified for PSGV as it could provide a minimum of 2,300 new homes.	
	No predicted effects for SRFI.	
16. Community identity &	Minor positive effects have been predicted for PSGV.	
participation	No predicted effects for SRFI.	
17. Crime and fear of crime	No predicted effects for either PSGV or SRFI.	
18. Sustainable prosperity & growth	Minor positive effects for PSGV given the potential to contribute to the local economy.	
	Significant positive effects have been identified for SRFI as it would be likely to provide direct and indirect benefits for the wider local economy.	
19. Fairer access to jobs & services	Minor positive effects have been predicted for PSGV as it would provide some new job opportunities.	
	Significant positive effects have been identified for SRFI as it would provide in the region of 3,400 new jobs.	
20. Revitalise town centres	Minor positive effects have been predicted for PSGV.	
	No predicted effects for SRFI.	

5 Update to SA Report information

5.1 Introduction

To take account of information provided in representations to the SA Report (September 2018), as well as take account of new evidence published since that SA Report was produced, it has been necessary to update some of the information that was included in the SA Report.

The details of these updates are provided in Appendix D, and summarised below.

5.2 Summary of SA Report updates

The new and updated assessments and updates to the information provided in the SA Report are as follows:

Policy S6 iv) North Hemel Hempstead Broad Location - the SA has been updated to make reference of the nearby scheduled monument. No update to the assessment 'score' required.

Policy S6 vi) North St Albans Broad Location - the SA has been updated to make reference of the heritage assets in the area. The assessment has been updated to reflect the uncertainty relating to the potential effects on these heritage assets.

Policy S6 vii) North East Harpenden Broad Location - The SA has been updated to make reference of the nearby Listed Building and Conservation Area. The assessment has been updated to reflect the minor adverse effects on these heritage assets that could result.

Policy S6 viii) North West Harpenden Broad Location - The assessment has been updated to reflect the minor adverse effects on these heritage assets that could result.

Policy S6 ix) West of London Colney Broad Location - the SA has been updated to make reference of the nearby Listed Buildings. No update to the assessment 'score' required.

Policy S6 xi) Park Street Garden Village Broad Location - the assessment has been updated to reflect that the majority of the site area is not classified as previously developed land and minor adverse effects are therefore predicted. In addition the SA has been updated to make reference to a Listed Building and the assessment has been updated to reflect the minor adverse effects on heritage assets that could result.

Appendix A and Appendix B of the SA Report (September 2018) have been updated to make reference to the new Strategic Flood Risk Assessment which supersedes the previous SFRA from 2007.

Appendix F of the SA Report (September 2018) has been updated to include the amended assessments which are detailed in Appendix D to this Addendum and summarised above.

In addition a new element has been added to the SA Report information, this being an assessment of a potential SRFI at Park Street (see Section 4 and Appendix C to this Addendum).

5.3 Implications for the SA

[FINDINGS TO FOLLOW]



6 Next Steps

This SA Report Addendum forms part of the SA Report documents that will be submitted to the Secretary of State for examination.

It may be necessary to undertake further additional SA to respond to any changes that are recommended by the Inspector, or put forward by the Council, during the Examination process. Any such additional SA will be documented in a further addendum to the SA Report.

When the Local Plan is adopted it will be accompanied by an SA Adoption Statement. In line with the SEA Regulations, the SA Adoption Statement will provide the following information:

- How environmental/sustainability considerations have been integrated into the Local Plan;
- How the SA Report has been taken into account;
- How opinions expressed in relation to the consultations on the Local Plan and SA Report have been taken into account;
- The reasons for choosing the Local Plan as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental/sustainability effects of the implementation of the Local Plan.

Appendix A: St Albans Publication Local Plan: SA/SEA Representations

SA/SEA responses to issues raised in the representations

Representations requiring response or further action	SA/SEA response to representation
Historic England	
Policy S6 i) We note that the SA refers to the three listed buildings at Wood End Farmhouse but makes no mention of the assets to the east centred on Gorhambury and considers that the effects of the allocation on the historic environment are uncertain. The SA will need to be reviewed to take into consideration the nearby heritage assets.	The assessment for Policy S6 i) states that "Development of the site would also have the potential to impact upon the setting of Gorhambury Grade II Registered Park and Garden and its associated heritage assets." No update to SA required.
Policy S6 ii) We note that the SA makes reference to Breakspear house and states that the effects of development on this asset is uncertain. There is no mention however of the heritage assets centred on Gorhambury to the east of the site. The SA will need to be reviewed to take into consideration the nearby heritage assets.	The assessment for Policy S6 ii) states that "Development of the site would also have the potential to impact upon the setting of Gorhambury Grade II Registered Park and Garden and its associated heritage assets." No update to SA required.
Policy S6 iii) We note that the SA mentions both the listed buildings on the site and nearby listed buildings but states that the effects of the proposed development on these assets is uncertain. Again however, no mention is made of the heritage assets centred on Gorhambury to the east of the site. The SA will need to be reviewed to take into consideration the nearby heritage assets.	The assessment for Policy S6 iii) states that "Development of the site would also have the potential to impact upon the setting of Gorhambury Grade II Registered Park and Garden and its associated heritage assets." No update to SA required.
Policy S6 iv) We note that the SA makes reference to the listed buildings, again concluding uncertain effects, but it makes no reference of the nearby scheduled monument. Again the SA will need to be revisited to make reference to the scheduled monument.	The SA has been updated to make reference of the nearby scheduled monument. No update to the assessment 'score' required.
Policy S6 v)	Noted
We note that the SA finds that the effects of the allocation on the historic environment are uncertain.	
Policy S6 vi) The SA makes no reference of the heritage assets in the area. The SA will need to be reviewed to take into consideration the nearby heritage assets and their settings.	The SA has been updated to make reference to the heritage assets in the area. The assessment has been updated to reflect the uncertainty relating to the potential effects on these heritage assets.

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Policy S6 vii)	The SA has been updated to make reference of the nearby
The SA makes no reference of the nearby designated heritage assets. The SA will need to be reviewed to take into consideration the nearby heritage assets. We consider that the impact is likely to be negative/adverse. The land forming this allocation site from part of the setting of the Farm and the NPPF is clear that the development within the setting of a heritage asset may lead to harm to the significance of that asset.	Listed Building and Conservation Area. The assessment has been updated to reflect the potential minor adverse effects on these heritage assets.
Policy S6 viii) We note that the SA mentions these assets [Cooters End Farm; The Old Bell Public House] but states that the impact on the historic environment is uncertain. We disagree. Without sufficient policy protection in place, and with development proposed on three sides of Cooters End Farm, we consider that the impact is likely to be negative/adverse. The land forming this allocation site from as part of the setting of the Farm and the NPPF is clear that the development within the setting of a heritage asset may lead to harm to the significance of that asset.	The SA has been updated to reflect the potential minor adverse effects on these heritage assets.
Policy S6 ix) The SA makes no mention of the listed buildings and structure to the south of the site. The SA identifies adverse effects on the historic environment. Given this conclusion, it is surprising to find neither further assessment of the impacts nor any mention within the Plan.	The SA has been updated to make reference of the nearby Listed Buildings. No update to the assessment 'score' required.
Policy S6 xi) We note that the SA mentions the nearby heritage assets (with the exception of the Turret) but states that the impact on the historic environment is uncertain. We disagree. Without sufficient policy protection in place, and with the development proposed we consider that the impact is likely to be negative/adverse.	The SA has been updated to make reference of the Allan-Williams Turret. The assessment has been updated to reflect the potential minor adverse effects on heritage assets.
Natural England	
The response from Natural England stated that "Natural England does not consider that this St Albans District Council Local Plan Publication 2018 poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation."	Noted
Environment Agency (1147557)	
The SA doesn't currently provide any explicit commentary on the process the Council undertook to apply the sequential test based on the latest SFRA, taking future climate change into account	The SA Report information has been updated to reflect the findings of the update to the SFRA, published in January 2019. This identifies the potential future flood risk taking climate change into account.
	The SA Report (September 2018) provided an assessment of Policy L29 'Green and Blue Infrastructure, Countryside, Landscape and Trees' and found that the policy's requirement of seeking to avoid development in areas at risk

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	from flooding and ensuring that water and flood risk are fully addressed by new development should have a positive effect on the 'flood risk' objective (SA3).
Hertfordshire County Council (837689)	
Agree with the supporting statement in the SA with regards to flood risks but recommend the creation of an aim of new development that contributes to reducing existing flood risk (where applicable)	The SA Objective for flood risk (SA3) was updated in xxx to take account of comments from the Environment Agency. That updated objective was used in the assessments included in the SA Report (September 2018). It is not appropriate at this stage in the SA process to update the objective a further time, however the comment from HCC is noted and will be considered for inclusion in future SA work undertaken by the Council.
Dr Robert Spence ID 334023	
The SA has not considered the impact of increasing the East Hemel South proposed dwellings development by 140%	The assessment of 'Policy S6 iii) - East Hemel Hempstead (South) Broad Location' identified the potential effects of building 2,400 new homes at this Broad Location. This included an identification of the environmental constraints associated with this area.
Stackbourne Limited (1153646)	
There is no compatibility between the Vision and Objectives listed within the Plan and the SA objectives	Table 3-2 in the SA Report provides an assessment of the compatibility between the Local Plan Vision and Objectives and the SA objectives.
Department of Health & Social Care and Bloor Homes (1156886)	
The SA is flawed as it does not consider alternatives for Park Street Garden Village The Plan is not considered to be deliverable, an objection is made to Policy S1 in particular the introduction of Park Street Garden Village in Category 2, there is no justification or evidence to support the inclusion of the Garden Village. The Plan in this respect is not justified or consistent with national policy as exceptional circumstances have not been demonstrated to support the inclusion of Park Street Garden Village. It is considered that not all reasonable alternatives have been considered and consequently the Sustainability Assessment is flawed and the Plan is therefore unsound.	During the process to develop the Local Plan there has been extensive and detailed consideration of options and reasonable alternatives. Whilst the SA has informed the process it is not the purpose of the SA to decide the alternative to be chosen for the Local Plan, nor is it the role of the SA to determine what is and what isn't a 'reasonable alternative' – those are both decisions to be made by the plan-making authority.
	The SA has assessed all the options which the Council has considered to be reasonable alternatives. Section 4 of the SA

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The Plan and the accompanying SA rely on much of the previous work undertaken to support the Strategic Local Plan (SLP) and draft Detailed Local Plan (DLP), the evidence base for which is out of date	Report provides information on the various stages at which different sites have been considered in the SA process. The SA work on the SLP/DLP and now the new Local Plan have been part of the ongoing process to replace the 1994 Local Plan. SA is an iterative process and has been updated as appropriate when work moves forward. This has included taking into account updates to the evidence base, in terms of both other relevant policies, plans and programmes and baseline information.
Helioslough Ltd (1182085)	
The SA is misleading in its assessment of PSGV. It includes ambiguous statements, does not consider site constraints which could hinder development proposals, and ignores the loss of benefits resulting from not providing the SRFI.	The comment relating to ambiguous statements and constraints is addressed below for the various SA topic related comments.
	The assessment for PSGV was undertaken using the baseline as being the site in its current status and was not a comparison between the PSGV and the SRFI. It did not consider benefits lost or benefits gained between one proposed use and another potential use.
The biodiversity score for the SA of PSGV should be downgraded to 'very unsustainable'	This comment is made on the premise that PSGV should be assessed against an 'SRFI baseline' and not a 'current status baseline'. As described above that has not been the case.
The SA for PSGV fails to mention that flood risk zone 3 is a relatively wide band (approximately 140m) which runs along the eastern boundary of the Park Street urban area in the vicinity of the station, thereby creating a gap in development. This does not affect the flood risk score but it is related to subsequent objectives.	The SA has recognised that the area of flood risk zone would not be suitable for new built development.
The greenhouse gas emissions score for the SA of PSGV should be graded as 'unsustainable'.	As described above the assessment has been made against
Significant benefits are claimed due to the range of planned facilities. This is agreed with reference to facilities such as schools and local shops, however there is no significant other employment proposed and there are only a very limited number of existing employment areas within an acceptable walking or cycling distance. The site and specifically the developable area is not next to a train station as claimed. Equally it is claimed that the P&Ra is a benefit which, for the reasons set out above, may encourage more cars to access the car park. In contrast, as the SRFI will enable freight to be transferred from road to rail, it is forecast that the SRFI will result in a significant	the 'current status baseline' and not an 'SRFI baseline'. The policy requirement for the development to deliver transport network (including walking and cycling links) and public transport services upgrades/improvements, including a new park and rail facility and increased rail services were considered in the assessment to warrant a score of 'significant positive'. This view still stands.
reduction in greenhouse gases. For these reasons the PSGV assessment can certainly not be marked as 'Very Sustainable'. Indeed, when compared to the consented scheme which is currently being progressed and is forecast to reduce greenhouse gas emissions then the PSGV	The site is next to the rail station but it is acknowledged that without any new access the walk to the station is further and due to the size of the site some of the PSGV will be some

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should be scored as 'Unsustainable'	distance. However the whole site is still relatively close to a station, particularly as it is a relatively level walk/cycle.
Air Quality – This is scored twice on the basis of local facilities and location with respect to St Albans. The first score of 'Sustainable' is on the same basis as greenhouse emissions hence for similar reasons it should be neutral at best. The poor relationship to St Albans is correct and hence this is correct as 'Unsustainable'.	See comments above relating to greenhouse gas emissions.
Sustainable Locations – The appraisal admits that the location with respect to St Albans is not good. It then seeks to justify a sustainable score due to the limited local facilities and possible rail improvements which could be used by local residents. For the reasons noted in this report, the rail opportunities are limited in terms of facilities and proximity, and the local facilities would only account for a small number of car trips. The score for location should therefore be 'Unsustainable'.	The appraisal identified that "This site is located some distance from the city/town centres". Whilst the site is some distance from St Albans it is planned as a sustainable community supported by the necessary infrastructure and facilities and therefore the level of facilities that will be provided make the development more sustainable, as identified in the assessment.
Given the points above the PSGV should be scored less for three objectives.	See comments above for each of these three objectives
SA incorrect to refer to site as previously developed land - land developed for minerals extraction excluded by paragraph 70 of NPPF. Therefore, the PSGV site is not considered to be a previously developed site and should be rated as 'unsustainable'.	The SA identified that <u>part</u> of the site is PDL, not the whole of the site. However the assessment has been updated from 'uncertainty of effects' to 'minor adverse effects' as the majority of the site is not classified as being previously developed land.
In considering the wider strategic implications of not providing the SRFI, the PSGV rating for resource efficiency should be downgraded to 'unsustainable'.	See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.
SA incorrect that prior gravel extraction will have destroyed any archaeological remains if they existed as some of the site has not been quarried. Therefore, the PSGV development has potential to have an adverse impact on below ground archaeological features. Due to the uncertainty of whether the unquarried section of the site contains below ground archaeology, the sustainability rating is correct as 'uncertain'.	Noted
The approved SRFI proposals include a 334ha Country Park which includes substantial benefits considered to exceed the requirements of policy S6 xi for the PSGV. When factoring in the loss of the landscape and biodiversity benefits proposed by the SRFI, the 'sustainable' score should be reduced to at least 'Neutral'.	See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.
The recreational opportunities set out by policy S6 xi would undoubtedly be beneficial for local residents of the PSGV, however there are conflicts with existing infrastructure that need to be given further consideration. These proposals also need to be considered in light of the substantial Country Park offered by the SRFI proposals not being delivered. The scale of the SRFI Country Park has the potential to offer health benefits to not only the lifestyles of local residents but the lifestyles of those living in the wider district and county. It is for these reasons that the PSGV health score should be downgraded to 'neutral'.	See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.
Whilst the local centre and new schools are likely to reduce some trips by car, PSGV residents will have to travel to the surrounding city/town centres for goods and services beyond the daily essentials. Furthermore, as discussed in the greenhouse	The SA identified 'minor positive' effects against the SA objectives relating to the economy. This assessment still

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gas emissions paragraphs above, the PSGV does not appear to provide any substantial sources of employment beyond the new	akan da		
schools and shops. In comparison, the SRFI scheme would create significant additional employment opportunities of approximately 3,400 full time jobs and a further 500 jobs related to the scheme.	stands. See previous comments regarding the approach taken to the assessment with regard to the baseline assumptions.		
In terms of rail improvements, the requirements of policy S6 xi has various limitations which relate to the Abbey Line. Firstly, the policy states that there should be services every 15-20 minutes at peak times, with no mention of off peak timetabling. Secondly, the St Albans Abbey train station is not located centrally and would require additional travel to access the centre. Thirdly, the Park Street station is not best positioned for the PSGV, being located on the western side of the railway. Finally, the developable area is not located next to a rail station as suggested, located 900m from the nearest house, which may encourage more cars to park in the park and rail facility. All of these points are discussed in more detail in the TTM at Appendix B. The sustainable location score should be 'unsustainable'	See comment above relating to the distance of the site from Park Street Station		
The SA gives the PSGV a 'sustainable' rating based on the new local centre and the potential for new employment opportunities. Whilst the new local centre is likely to provide daily essentials for residents of the PSGV, services and facilities beyond this will be sought from surrounding town/city centres. As discussed in the greenhouse gas emissions paragraphs above, the PSGV does not appear to provide any substantial sources of employment beyond the new schools and shops. In comparison, the SRFI scheme would create significant additional employment opportunities of approximately 3,400 full time jobs and a further 500 jobs related to the scheme.	The SA identified 'minor positive' effects against the SA objectives relating to the economy. This reflected the potential for PSGV to support the local economy and to provide some additional employment opportunities. This assessment still stands. See previous comments regarding the approach taken to the		
The sustainability rating should be reduced to 'neutral' for the reasons set out above.	assessment with regard to the baseline assumptions.		
SA and the Plan are not considered to be consistent with national policy as they don't aim to deliver sustainable development	The SA helps to guide the development of the Local Plan, including providing an assessment of the reasonable alternatives considered. It cannot in itself 'deliver' sustainable development.		
Helioslough Ltd (1182085) Department of Health & Social Care and Bloor Homes (1156886)			
The Plan and SA have not been positively prepared as they disregard the planning permission that exists for the SRFI.	The view of the Council is that the SRFI is not a 'reasonable alternative' for that site and therefore it was not assessed in the SA. However for purposes of completeness the principle of developing an SRFI on the same site as that allocated for PSGV has now been assessed as part of this SA Report Addendum (see Section 4 and Appendix C).		
Taylor Wimpey Strategic Land (1187472) Martin Grant Homes and Kearns Land (975683) ERLP 1 Sarl (1123561) M Scott Properties	s (1185993) Mr Pete Hutchison (1153268) Department of Health		
& Social Care and Bloor Homes (1156886) Owner Pound Farm &East of Sandridge (1187227) Helioslough Ltd (1182085)			
The SA/SEA does not consider other/all specific sites that have been put forward and fails to provide an assessment for them, explaining why they have been rejected	The SA/SEA has provided an assessment of all the sites considered by the Council to be reasonable alternatives. Section 4 of the SA Report provides information on the various stages at which different sites have been considered		

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	in the SA process.			
ERLP 1 Sarl (1123561)				
No reasonable alternatives to the 12 Broad Locations have been assessed. The SA is flawed and outdated.	The SA/SEA has provided an assessment of all the sites considered by the Council to be reasonable alternatives. Section 4 of the SA Report provides information on the various stages at which different sites have been considered in the SA process.			
Owner Pound Farm & East of Sandridge (1187227)				
The council hasn't consulted on the SA	The Council consulted on the SA at the Regulation 18 Issues and Options Stage (January 2018) and at the Regulation 19 Publication Stage (September 2018). Section 2.4 of the SA Report provides a summary of the consultation that has been undertaken.			
1153741				
The SA should contain a fuller assessment and development scoping exercise must be carried out on the East Hemel Hempstead (North) development to ensure that the area maintains an appropriate landscaping and character, sympathetic to the nearby settlement.	The SA has provided a 'high level' assessment of Policy S6 i) East Hemel Hempstead (North) Broad Location. More detailed consideration of landscaping and character will be given at the Masterplanning and detailed planning application stages.			
The Dak (ID 1186131) and multiple individuals/groups/companies making the same representation				
The audit trail of where and when the decision was made to solely focus on strategic sites is almost impossible to follow. It is not set out clearly within the Sustainability Appraisal report and seems to have been a decision arrived at through discussions at various Planning Policy Committee meetings. The Sustainability Appraisal report is required by European law to detail the likely significant environmental effects of the Local Plan and of the reasonable alternatives. It is also a soundness test for the Local Plan to be considered against reasonable alternatives.	During the process to develop the Local Plan there has been extensive and detailed consideration of options and reasonable alternatives. Whilst the SA has informed the process it is not the purpose of the SA to decide the alternative to be chosen for the Local Plan, nor is it the role of the SA to determine what is and what isn't a 'reasonable alternative' – those are both decisions to be made by the			
It is not clear where or how the Council has assessed the option of focusing solely on strategic sites and compared it with the reasonable alternative of allocating a larger number of smaller sites. There are advantages and disadvantages with strategic sites. For example, it is accepted that larger sites are often better able to provide on-site infrastructure. However, they take longer to deliver and are more prone to delays than smaller sites. This is an important consideration given the historic underdelivery of housing and the affordability issues that have been created. There does not appear to be any like-for-like comparison to enable respondents to understand how the decision has been taken and how different factors have been weighed.	plan-making authority. The SA has assessed all the options which the Council has considered to be reasonable alternatives. Section 4 of the SA Report provides information on the various stages at which different sites have been considered in the SA process. As reiterated in the SA Working Note (January 2018), which			

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The housing issue is particularly important because of the strong influence on delivery rates that arises from the strategic-sites-only approach. Despite a five-year period that begins in 2020 and despite ignoring any historic shortfall, the Council is still unable to demonstrate a five-year land supply because of the lack of small- and medium-size sites. The "stepped" housing trajectory employed by the Council is only necessary because of the focus on strategic sites. The negative consequences of this should have been recorded in the Sustainability Appraisal and explicitly considered in the Council's decision-making.	was produced at the Regulation 18 stage, the Council considered a series of options for the development strategy (see Section 4.4.1. of the SA Report (September 2018)). The Council's preferred approach was based on Option 1a (Mixed Location / Scale Development) which relied on larger strategic sites to deliver the levels of development to meet local needs. As a result it was only strategic sites which were subsequently considered for inclusion in the Local Plan.
	However, whilst the larger strategic sites provide the best opportunities for infrastructure provision and planning gain opportunities, including biodiversity enhancements, when compared to a larger number of smaller developments, the SA of the Publication Local Plan did recognise that in addition to the larger sites, smaller sites do play an important role in delivering the housing requirement.
	In the assessment of Policy S4 Housing Strategy and Housing Requirement/Target the SA identifies positive effects against SA13 (Sustainable locations) in relation to the policy's recognition that smaller sites, including those of half a hectare or less, have been and will continue to be an important source of housing land supply.
Sustainability implications of the spatial strategy have not been properly assessed	The assessments of Policy S1 Spatial Strategy and Settlement Hierarchy, as well as Policy S2 Development Strategy, identify the implications of using the approach to the spatial strategy that is included in the Publication Local Plan.
M Scott Properties (ID 1185913 and ID 1185991)	
Flawed assessment of Park Street Garden Village. No acknowledgement of the planning permission for the SRFI on the site of the proposed Park Street Garden Village	See response above to similar comments made in the representation by Helioslough.
SA methodology excludes small to medium sites in sustainable locations with facilities beneficial for any development	See the comments above made in response to the representation by The Dak.
SA is inconsistent with the proposed 2020 commencement date for the emerging Local Plan. The SAR contains no justification for the 2020 start date of the ELP. This is inconsistent with national policy, particularly the NPPF 2018 which states at paragraph 11 that: "11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change."	It is not the role of the SA to justify the start date for a Local Plan.

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It is not considered that the ELP meets development needs nor is sufficiently flexible to adapt to rapid change given it does not cover the period to 2020.	
The SA should provide an objective-led approach whereby the potential impacts of a development plan, its allocations and all reasonable alternatives are appraised to the same level of detail in order to identify their contribution to sustainable development	At each separate stage of the SA process the policies/sites have been assessed at the same level of detail.
Support the SA statement that not all villages are suitable for accommodating growth	Noted
The SA does not consider financial implications of providing infrastructure	The Sustainability Appraisal process is not required to, or designed to, take such financial considerations into account.
Martin Grant Homes and Kearn Properties	
SA does not make it clear why Land East of Redbourn was rejected	Section 4.4.2. of the SA Report provides an explanation of why the Land East of Redbourn was not included as an allocation in the Publication Local Plan.
Trustees of James Henry Frank Sewell Deceased (1185630)	
The SA demonstrates full compliance with the Plan's requirement to consider social, economic and environmental factors	Noted
Redbourn Parish Council (759908)	
The SA fails to address the negative consequences of housing provision on large strategic sites and the impacts this has on supply	The assessments for the strategic sites did identify adverse effects against some of the SA objectives.
	In relation to the comment on supply, see the response to The Dak above.
No consultation was undertaken for North East Redbourn site at the Issues and Options stage. Unclear how the site (as well as other 'omission sites') was explored as an alternative in the Sustainability Appraisal (SA)	The Issues and Options Regulation 18 consultation stage in January 2018 considered potential approaches for providing new development to meet the needs of the local population but did not include Broad Locations. Section 4.3.3.3. of the SA Working Note (January 2018) states " At this new Regulation 18 stage in the development of the Local Plan there has been no new assessment of sites or wider broad locations. This work will be undertaken during the SA that is undertaken as part of the development of the Publication Local Plan."
	Subsequently, the North East Redbourn site was considered as a 'reasonable alternative' alongside assessments of 11 other broad locations in the SA Working Note prepared for

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the Planning Policy Committee in May 2018. Section 4.4.2 of the SA Report (September 2018)) provides a summary of the findings, including the reasons behind North East of Redbourn not being taken forward into the Publication Local Plan, whist the full SA Working Note is included as Appendix E12 to the SA Report. The opportunity for consultation on the SA Report was provided at the Regulation 19 stage. Batford Community Action Group (ID 1185696) SA will not be finished until March 2019. No chance to respond. The SA Report was prepared in September 2018 and was part of the consultation at the Local Plan Regulation 19 stage. This is the statutory requirement for the publication of the SA Report. This SA Report Addendum provides some additional details to support the SA Report, but as the Local Plan has not been subject to any Major Changes between the Regulation 19 consultation and Submission there is no requirement for additional consultation to be undertaken. Leverstock Green Village Association The allocation of East Hemel Hempstead (South) does not appear to be evidence based, with the allocation of the broad The SA has highlighted the main opportunities and location reaching far beyond the Green Belt Review's recommendations for release. The Sustainability Appraisal conclusions constraints for the Broad Location, both for the site identified for this policy also do not seem to differ greatly for the previous conclusions for a site which was allocated for fewer dwellings. in the Strategic Local Plan and for the larger area allocated in the Local Plan. Where additional constraints have been identified for the larger site these have been identified. However the larger site does not include any additional significant constraints and therefore the original assessments have not been substantially changed. 5. Habitats Regulations Assessment The SA Screening Update reviewed the findings of the previous HRA and considered new evidence relating to the 5.1 Annex 1 of the SA (2018) of the St Albans Local Plan includes a copy of the HRA Screening update (originally prepared in Chiltern Beechwoods SAC as well as other factors, including 2008). This considers the impact of the recent EU Court Judgment of the 'People Over Wind' case and determines that the recreational disturbance and air quality effects, in order to findings of the 2008 HRA Screening remain valid and that the current version of the Plan will not have likely significant effects confirm whether the findings still stood. on the Chilterns Beechwoods SAC. In their representation at the Regulation 19 stage Natural 5.2 The Screening is reliant on assessment of earlier work including, for example, potential growth sites included in the 2006 England made no comment in relation to the HRA Screening Issues and Options Paper: Growth at Hemel Hempstead. Although it is acknowledged that this did consider a wide range of Update. growth options the document is dated and must be considered in combination with growth that has taken place since then

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and potential impacts on the SAC.

- 5.3 The Screening also suggests that because the remainder of the 2008 HRA Screening (i.e. that beyond issues associated with out-commuting for employment) concluded that there was no need for mitigation measures to conclude 'no likely significant effects', the 'People Over Wind' ruling does not have any implications for this update and, as such, an Appropriate Assessment is not required.
- 5.4 Natural England is being consulted on the HRA Screening alongside consultation on the Local Plan and so, as yet, their response is unknown. We suggest that it is inappropriate to rely on evidence and material prepared more than a decade ago and that all up-to-date and current evidence must be considered before a conclusion can be satisfactorily made.
- 8. East Hemel Hempstead (South) Broad Location (Site Specific Matters)

...

Sustainability Appraisal Findings

- 8.26 The site was previously allocated in the 2016 Strategic Local Plan in Policy SLP13 a), which required the development to deliver a minimum of 1,000 dwellings.
- 8.27 Given that the dwelling allocation has significantly increased by 1,400 dwellings to 2,400 dwellings, it is expected that there would be significant changes in the assessment of impacts in the Sustainability Appraisal.
- 8.28 However, the Sustainability Appraisal does not conclude that there are significant differences between the allocation of fewer dwellings in the 2016 SLP and the 2018 Local Plan as shown in Figures 8.3 and 8.4 below.
- 8.29 For two objectives, the 2018 SA assesses that the larger development would be marginally more sustainable than the smaller development assessed in the 2016

Sustainability Appraisal. Differences are shown for the 'Soils' objective where the 2016 SA assesses 'significant adverse effects' and the 2018 SA assesses the soils objective as 'unsustainable'. The assessments for the landscape & townscape objective also differ between 2016 and 2018, with the assessment of the effect on landscape changing from 'significant adverse effects' to 'unsustainable'. This is curious given that the site is situated on the same area.

- 8.30 There are only three objectives where the 2018 SA predicts marginally more unsustainable effects for the significantly larger development (revising the assessment from 'very sustainable' to 'sustainable'): 'equality/social inclusion', 'sustainable prosperity and growth' and 'fairer access to services'.
- 8.31 The LGVA therefore do not consider that the Sustainability Appraisal has fully considered the impact of increasing the dwellings by 140%.

The assessment for the soils objective (SA4) was updated from "significant adverse' in 2016 to 'minor adverse' in 2018 in order to reflect the new information produced by Natural England in 2017 relating to agricultural land quality. The latest evidence indicated that approximately 19% of the site contains Best and Most Versatile (BMV) agricultural land.

The 2016 assessment used a methodology whereby the presence of any amount of BMV resulted in a 'significant adverse' score, whereas in 2018 a more robust methodology was used which only allocated such a score if more than 25% of the site is classified as BMV land.

The assessment for the landscape and townscape objective (SA11) was updated from "significant adverse' in 2016 to 'minor adverse' in 2018 as the later assessment took account of the fact that none of the area is designated as a Landscape Character Area in the St Albans Local Plan, nor is it covered by any other designation.

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Appendix B: Screening of proposed minor modifications to the Publication Local Plan

The table below lists the proposed minor amendments and corrections to the Publication Local Plan and identifies whether the proposed changes have any implications for the findings of the sustainability appraisal that were included in the SA Report (September 2018).

[TABLE TO FOLLOW]



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Appendix C: Assessment of Strategic Rail Freight Interchange

This Appendix provides an assessment of the proposed Strategic Rail Freight Interchange (SRFI) alongside the existing assessment for Park Street Garden Village (PSGV).

Assessments for Park Street Garden Village (PSGV) are shown in black text. These are based on the assessments included in the SA Report (September 2018), with changes to those assessments being shown in <u>underline</u> and strikethrough text. These changes are the same as those described in Appendix D to this SA Addendum and have been made independent to the assessment of the SRFI to reflect representations made by Historic England (see Appendix A) and to include new information on flood risk.

Assessments for the Strategic Rail Freight Interchange (SRFI) are shown in blue text. The assessments have been informed by information in the Sustainability Statement for the SRFI (CgMs Ltd, March 2009), the Environmental Statement for the SRFI (ES) (Various Consultancies, March 2009) and the Sustainability Appraisal undertaken for the Draft National Policy Statement for National Networks (Ramboll, December 2013)

Assumption for the assessment

The assessments for PSGV and SRFI have both been undertaken using the baseline as being the site in its current status. It does not consider benefits lost or benefits gained between one proposed use and another.

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Policy S6 xi) Park Street Garden Village Broad Location

and

Strategic Rail Freight Interchange

		Assessment of Effect					
		Nature of Pffort	d)		Sig	nificano Effects	
	SA Objective	Nature of Effect Including where appropriate whether the effects are direct/indirect and likely/unlikely. Justification and Evidence	Permanence	Scale	In the short term	In the medium term	In the long term
1	Biodiversity	PSGV : The largely greenfield nature of this site means that there will be some loss of habitats. The site includes areas of grassland and wetland used by breeding, wintering and wading birds.	P	L	*	×	×
		PSGV : The size of the development would provide opportunities for biodiversity gains. The development would be required to provide managed woodland and ecological network links. Countryside access links will encourage people to come into contact with, understand, and enjoy nature.	P	N	✓	~	✓
		SRFI : The largely greenfield nature of this site means that there will be some loss of habitats. The site includes areas of grassland and wetland used by breeding, wintering and wading birds.	P	L	3c	36	*
		SRFI : The SRFI would deliver biodiversity gains associated with the proposed Country Park.	P	N	✓	✓	✓
2	Water quality/ quantity	PSGV : The development would be required to deliver excellence in water management. No site specific predicted effects.	-	-	-	-	-
		SRFI : The Sustainability Statement identifies that water conservation will be led through good design measures. No site specific predicted effects.	-	-	-	-	-

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3	Flood risk	 PSGV: Approximately 7.5% of the site is in the flood risk zones 2 and 3 associated with the River Ver which runs through the north west corner of the site. There would therefore be a flood risk for new development. However, the Local Plan Policies Map indicates that the north-west area of the site is allocated for `L18 Transport Strategy (improvements in Green Belt)' (of which approximately 25% is in flood zones). As the majority of the site is in the lower risk flood zone 1 the flood risk area could be avoided for new built development. The 2018 SFRA considers the implications of climate change: It shows that none of the site lies in `Flood Zone 3 + 70%CC'. It identifies that some parts of the site are classified as `RoFSW¹ + CC (1 in 100-year + 40% CC)'. These will need to be taken into account in future masterplanning and detailed design. 	P	L	×	×	×
		SRFI : Flood risk is the same as reported for PSGV above. The ES identifies that there would be no built development in the area of the site which is at risk of fluvial flooding.	Р	L	*	*	34
4	Soils	PSGV : Site is mainly greenfield and therefore soil sealing would result from new development.	Р	L	æ	æ	×
		PSGV : It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. There is no detailed ALC mapping for this site. The regional scale mapping for ALC undertaken by Natural England in 2017 classifies the majority of this site (approx. 75%) as 'Non-agricultural use'. Of the remaining site area there is an approximately: 50:50 split between the classifications of: 'Moderate likelihood of BMV land (20-60% area bmv)'; and 'High likelihood of BMV land (>60% area bmv)' ² . If detailed mapping is undertaken for this location in the future the 'uncertain' assessment could change to minor adverse if some BMV, but less than 25% of the total area, were to be identified, or significant adverse if this was found to be greater than 25% of the total site area. PSGV : Development could provide the potential to remediate any contaminated land	-	-	?	?	?
		associated with the site's former use as an aerodrome.					
		SRFI : Site is mainly greenfield and therefore soil sealing would result from new development.	P	ш	30	æ	36

¹ Risk of Flooding from Surface Water

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² http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008

		SRFI : It is uncertain as to the amount of 'Best and Most Versatile' agricultural land (if any) that is associated with the site. There is no detailed ALC mapping for this site. The regional scale mapping for ALC undertaken by Natural England in 2017 classifies the majority of this site (approx. 75%) as 'Non-agricultural use'. Of the remaining site area there is an approximately: 50:50 split between the classifications of: 'Moderate likelihood of BMV land (20-60% area bmv)'; and 'High likelihood of BMV land (>60% area bmv)' ³ . If detailed mapping is undertaken for this location in the future the 'uncertain' assessment could change to minor adverse if some BMV, but less than 25% of the total area, were to be identified, or significant adverse if this was found to be greater than 25% of the total site area. Development could provide the potential to remediate any contaminated land associated with the site's former use as an aerodrome.		-	?	?	?
5	Greenhouse gas emissions	PSGV : The potential scale of development would require the provision of a range of facilities and services in the new neighbourhood and local centres (e.g. schools and shops) thereby reducing the need to travel for many day to day needs. This would help reduce the growth in greenhouse gas emissions that would inevitably result from any new development. The site is next to a rail station with direct connection to Watford & St Albans. In addition the development would be required to provide a new park and rail facility, as well as exploring opportunities for other rail related enhancements, all of which would provide alternatives to private car use.	P	N	44	44	44
		PSGV : This site is located some distance from the city/town centres (St Albans and Watford) which will result in increased car use and growth in the level of greenhouse gas emissions.	P	N	*	×	*
		SRFI : moving freight from road onto rail will result in an overall reduction in CO ₂ emissions from fright operations.	P	N	44	11	44
		SRFI : This site is located some distance from the main population centres which will result in increased car use for employees of the SRFI and lead to growth in the level of greenhouse gas emissions. The SRFI will also generate increased HGV movements associated with delivery and/or collection from the facility.	P	N	×	*	×
6	Climate change proof	PSGV: No predicted effects. SRFI: No predicted effects.	-	-	-	-	-
		SKF1. No predicted effects.	-	-	-	-	-

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C4 DRAFT

 $^{^3 \ \}underline{\text{http://publications.naturalengland.org.uk/publication/6205542189498368?category=5208993007403008}$

7	Air quality	PSGV : The site is relatively accessible to some services, facilities and open space which should help reduce the need to travel and minimise increases in airborne emissions. Development of new neighbourhood and local centres will further support this. The site is next to a rail station with direct connection to Watford & St Albans. In addition the rail-related improvements that would be associated with this site could help to reduce car usage and limit the increase in airborne emissions in the wider subregion. The requirement to deliver a local bypass route for Park Street is likely to reduce traffic levels in Park Street and Frogmore, with associated benefits for local air quality.	P	L	1	✓	✓
		PSGV : This site is located some distance from the city/town centres (St Albans and Watford) which will result in additional vehicle trips with associated airborne emissions. Development in this location could exacerbate air quality issues in `St Albans AQMA No.3' which encompasses a number of domestic properties in Frogmore on Radlett Road and Colney Street in the vicinity of the M25.	Р	L	×	×	×
		SRFI : Development of an SRFI would result in an overall reduction of HGV road miles which would have benefits for local air quality at a regional level. At a local level the Sustainability Statement identifies that delivery of the Park Street Relief Road as part of the development would reduce traffic levels in Park Street and Frogmore, with associated benefits for local air quality.	P	L/ R	✓	✓	✓
		SRFI: This site is located some distance from the city/town centres (St Albans and Watford) which will result in additional vehicle trips from employees of the SRFI, with associated airborne emissions. In addition it would result in an increased number of HGVs in the local area with an associated increase in associated airborne emissions. Development in this location could exacerbate air quality issues in 'St Albans AQMA No.3' which encompasses a number of domestic properties in Frogmore on Radlett Road and Colney Street in the vicinity of the M25.	P	L	×	£	×
8	Use of brownfield sites	PSGV : Part of the site is previously developed land. The majority of the site area is not classified as previously developed land. Minor adverse effects have therefore been predicted.	-	-	÷ ×	⊋ <u>*</u>	÷ *
		SRFI : The majority of the site area is not classified as previously developed land. Minor adverse effects have therefore been predicted.	-	-	.sc	3C	36

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9	Resource efficiency	PSGV : The development would be required to deliver excellence in energy efficiency and appropriate renewable energy production and supply mechanisms. The site is not located in a District Heating Opportunity Area but the scale of development provides opportunities for renewable energy production to be incorporated. The site is located within a Wind Opportunity Area. The site is located on a sand and gravel belt – but minerals have already been extracted at this location.	P	L	*	√	4
		SRFI : The Sustainability Statement identifies that the development would be designed to high levels of energy efficiency and incorporate other sustainable design measures.	P	L	✓	✓	✓
10	Historic environment	PSGV: The site is not subject to any significant heritage or archaeological constraint. A relatively small area near the western boundary of the site lies within the Park Street and Frogmore Conservation Area and there is a Grade II Listed Building (Toll Cottage, Burydell Lane, Park Street) in the same area of the site. In the north of the site there is also the Grade II listed Allan-Williams Turret. The settings of these heritage assets may be affected by any new development, although the topography and existing screening should minimise any adverse effects. The prior gravel extraction on the site will already have destroyed any archaeological remains – if they existed. Development could affect the settings of the 'Colne Chapel moated site' Scheduled Ancient Monument and Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area – both of which are on the other side of the railway to this site. Given the heritage assets, and their settings, which could be affected by the development of PSGV, minor adverse effects are predicted.	1	-	÷ *	÷ *	ن ×
		SRFI : see PSGV above for a summary of the heritage assets associated with this site. Given the heritage assets, and their settings, which could be affected by the development of SRFI, minor adverse effects are predicted.	-	-	æ	34	×
11	Landscape & Townscape	PSGV : The site is not in an area designated as a Landscape Conservation Area. Development of this site would result in the loss of open countryside. However the site is relatively well screened from the local area.	Р	L	*	×	×

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		PSGV : The development would be required to deliver strategic and public open space, recreation space and countryside access links, including a new Country Park. Development would also require the retention of important trees and landscape features. The principle behind the garden village concept, which requires them to be locally led and include consultation with the local community, should provide a high quality of layout and building design.	P	L	✓	√	✓
		SRFI : The site is not in an area designated as a Landscape Conservation Area. Development of this site would result in the loss of open countryside. However the site is relatively well screened from the local area.	P	г.	×	×	30
		SRFI : The development would provide recreation space and countryside access links, including a large new Country Park. The Sustainability Statement identifies that the development would include mitigation measures to minimise the effects and impact of the scheme.	P	L	√	✓	✓
12	Health	PSGV : The development is required to provide <u>a new Country Park</u> , countryside access links including improved footpaths, as well as walking and cycling links. These will provide the opportunity for new residents to live active lifestyles. In addition, the level nature of the site and its surrounding area make walking and cycling viable options.	P	L	√	~	✓
		An oil pipeline crosses the northern section of the site and would need to be taken into consideration in planning the layout of development. The southern part of the site is close to the M25 motorway and there could therefore be noise disturbance for the new residents.	-	·	?	?	?
		SRFI : The development would provide recreation space and countryside access links, including a large new Country Park. These will provide the opportunity for local residents to live active lifestyles. In addition, the level nature of the site and its surrounding area make walking and cycling viable options.	P	L	✓	✓	✓
		SRFI : Operation of the SRFI, with associated increase in HGV and rail movements could result in noise issues for local residents – dependent on mitigation. The SA for the Draft National Policy Statement for National Networks identifies a 'small negative' for noise impacts associated with the operation of SRFIs.	-	-	?	?	?

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13	Sustainable locations	PSGV : This site is located some distance from the city/town centres (St Albans and Watford); however there are new neighbourhood and local centres planned as part of the development which will meet some day to day needs and help reduce the need to travel. In addition the development could provide rail improvements which could be used by new and existing residents and provide opportunities to avoid car use.	Р	L	√	√	✓
		SRFI : This site is located some distance from the local population centres which means that employees are likely to be reliant on car use to access the site. However the Sustainability Statement identifies that additional public transport services will be provided to mitigate the need for car use.	P	L	✓	<	✓
14	Equality & social inclusion	PSGV : The principle behind the garden village concept, which requires them to be locally led and include consultation with the local community, should provide the new services and facilities and improved open space that meet the needs of the whole community. The development would be required to deliver a primary school, a secondary school, community facilities (including health provision) and new neighbourhood and local centres. Inclusion of a Gypsy and Traveller site will help to meet the needs of gypsy and traveller communities, in terms of access to services and facilities.	P	L	*	*	√
		SRFI: No predicted effects	-	-	-	-	-
15	Good quality housing	PSGV : Development at the site could provide a minimum of 2,300 new homes with the potential to meet a variety of accommodation needs and to deliver affordable homes in this part of the District. Development at this location would be required to provide two new 15 pitch Gypsy and Traveller sites which would help meet the housing need of the gypsy and traveller community.	P	L	44	*	11
		SRFI: No predicted effects	-	-	-	1	-
16	Community identity & participation	PSGV : The principle behind the garden village concept, which requires them to be locally led and include consultation with the local community, should help to support this objective.	P	L	√	*	✓
		SRFI: No predicted effects	•	-	-	1	-
17	Crime and fear	PSGV: No predicted effects.	-	-	-	-	-
	of crime	SRFI: No predicted effects	-	-	-	-	1
18	Sustainable prosperity & growth	PSGV : Development of a new garden village provides the potential for the provision of new local services and some new commercial development – which will help to support the local economy. In addition the provision of new housing would help to support the local services in Park Street, maintaining their viability and boosting the local economy.	P	L	*	*	✓

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		SRFI : Development of a SRFI would result in the provision of approximately 3,400 new jobs which would help to support the local economy and is likely to result in economic benefits relating to the supply chain and income/spending effects in the local area.	P	L	44	44	14
19	Fairer access to jobs & services	PSGV : New neighbourhood / local centres and potential commercial opportunities would offer new employment opportunities. Provision of new secondary education facilities will contribute to the provision of appropriate training opportunities and help local people acquire the skills needed to find and remain in employment.	P	L	*	*	✓
		SRFI : The Sustainability Statement identifies that development of the SRFI would result in the provision of approximately 3,400 new jobs, as well as providing the potential for indirect/induced employment opportunities for the local area.	P	L	44	44	14
20	Revitalise town centres	PSGV : Whilst development in this location does not support the objective to focus new development in the centre of urban areas, it would result in a new sustainable local community.	P	L	✓	√	✓
		SRFI: No predicted effects	-	_	_	-	-

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Appendix D: Updates to the SA Report (September 2018)

This appendix provides updates to the information provided in the SA Report (September 2018) that was prepared for Local Plan Publication stage. These updates have been necessary to take account of representations received during the consultation on the Local Plan and SA Report, as well as to reflect new evidence. The updates are provided on a SA Report 'section by section' and/or 'policy by policy' basis. The relevant parts of the SA Report, including its appendices and Non-Technical Summary, are identified, along with the change(s) required. The changes use <u>underline text</u> to show additions and strikethrough text to identify deletions.

SA Report

Amend the relevant rows in the table in Section 5.2.2 of the SA Report and Table 2 of the Non-Technical Summary as follows:

Amended cells are shown with red outline

									S	A Obj	ective	es								
Option	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy S6 vi) North St Albans	×	.,	.,		√		✓				×						, ,			
St Albans	✓	-	-	××	×	-	×	×	√	- <u>?</u>	✓	√	√	√	√ √	-	-	√	√	✓
Policy S6 vii) North East Harpenden	×		_	×	✓		✓		√		×	✓	√	√	11			√		√
	×	-	?	?	×	-	×	×	•	<u>-×</u>	✓	?	•	•	~ ~	-	_	•	-	·
Policy S6 viii) North West Harpenden				×	✓		✓		√	2	×	√	√	√	11			✓		✓
	*		_	?	×	_	×	*	V	? <u>*</u>	✓			V	~ ~	1		V	-	v
Policy S6 xi) Park Street Garden	×			×	//	-	✓	2	√	2	×	√	√	√	11	√		√	√	√
Street Garden Village	✓	1	×	?	×		×	? <u>×</u>	•	? <u>*</u>	✓	?	V	•	V V	V	-	V	•	

D1 DRAFT

M6Q19 Appendix 4

Amend the following sub-sections of Section 5.2.2. of the SA Report:

5.2.2.9. Policy S6 vi) North St Albans "...

There is uncertainty as to the effects against the 'historic environment' objective, given the heritage assets and their settings which are located near to this Broad Location.

..."

5.2.2.10. Policy S6 vii) North East Harpenden "...

Minor adverse effects have been predicted against the 'historic environment' objective, given the heritage assets and their settings which are located near to this Broad Location.

..."

5.2.2.11. Policy S6 viii) North West Harpenden "...

There is uncertainty in relation to the Minor adverse effects on the 'historic environment' are predicted as the site contains the Grade 2 Listed Building at Cooters End Farm and could impact on its settings. The Old Bell PH (Grade 2) is also close to the site.

..."

5.2.2.14. Policy S6 xi) Park Street Garden Village "...

As part of the majority of the site is not classified as previously developed land uncertain minor adverse effects have also been identified for the 'use of brownfield sites' objective.

...

There is uncertainty as to the Minor adverse effects on the 'historic environment' objective have been predicted as a relatively small area near the western boundary of the site lies within the Park Street and Frogmore Conservation Area and there is a Grade II Listed Building (Toll Cottage, Burydell Lane, Park Street) in the same area of the site. The settings of these heritage assets may be affected by any new development, although the topography and existing screening should minimise any adverse effects. Development could also affect the settings of the 'Colne Chapel moated site' Scheduled Ancient Monument and Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area – both of which are on the other side of the railway to this site.

..."

Amend Section 5.2.2 of the SA Report and the equivalent Section 5.3.7 of the Non-Technical Summary as follows:

"...

Minor adverse effects were identified for the <u>Broad Locations at North East Harpenden (Policy S6 vii))</u>; North West Harpenden (Policy S6 viii)); West of London Colney Broad Location (Policy S6 ix)); and Park Street Garden Village (Policy S6 xi)), given the specific constraints in proximity to that location these locations."

D2 DRAFT

SA Report Appendix A - PPP Review

Level 1 Strategic Flood Risk Assessment: Dacorum, St Albans, Three Rivers and Watford (2007)

The purpose of this study is to assess and map all forms of flood risk from groundwater, surface water, sewer and river sources, taking into account the future climate change predictions, and use this as an evidence base to locate future development primarily in low flood risk areas.

Objectives, Targets, Indicators

- Protect the functional floodplain from development;
- Direct vulnerable development away from flood affected areas;
- Ensure all new development is 'Safe', meaning that dry pedestrian access to and from development is possible without passing through the 2 in 100 year plus climate change floodplain, and emergency vehicular access is possible;
- Promote the use of sustainable urban drainage systems in all flood zones to achieve Greenfield discharge rates on both Greenfield and Brownfield sites:
- Support flood alleviation measures under consideration by the Environment Agency by safeguarding possible sites for flood storage and other channel works;
- Seek developer contributions via s106 planning obligations (in consultation with the Environment Agency) to fund strategic flood risk management facilities and bring benefit to the wider community.

South West Hertfordshire Level 1 Strategic Flood Risk Assessment (October 2018)

This Strategic Flood Risk Assessment (SFRA) covers the local authority areas of Dacorum Borough, St Albans District, Three Rivers District and Watford Borough. The purpose of this study is to provide a comprehensive and robust evidence base to support the production of Local Plans for the four Councils.

Objectives, Targets, Indicators

The key objectives of the Level 1 Strategic Flood Risk Assessment are:

- 1. To replace the Councils' existing Level 1 Strategic Flood Risk Assessment, taking into account most recent policy and legislation in the National Planning Policy Framework.
- 2. To collate and analyse the latest available information and data for current and future (i.e. climate change) flood risk from all sources and how these may be mitigated.
- 3. To inform decisions on the emerging Local Plan including the selection of development sites and planning policies.
- 4. To provide supporting evidence to support the Councils with the preparation of their Local Plans, allowing the application of the Sequential Test in the allocation of new development sites.
- 5. To provide a comprehensive set of maps presenting flood risk from all sources that can be used as an evidence base for use in the emerging Local Plans.
- 6. To provide advice for applicants carrying out site-specific flood risk assessments and outline specific measures or objectives that are required to manage flood risk to the appropriate standard.

D3 DRAFT

SA Report Appendix B - Baseline Review

"...

2.8.2.3 Flood risk

The landscape of south-west Hertfordshire, including St Albans, is such that the level of flood risk is relatively low, in particular along the chalk tributaries such as the Gade and the Bulbourne where the catchment topography is such that river flooding will only affect a relatively narrow and well-defined corridor as opposed to an expansive floodplain.

The River Gade flows from north to south through Hemel Hempstead town centre, while Berkhamsted is situated along the River Bulbourne and the Grand Union Canal.

A Strategic Flood Risk Assessment (SFRA) covering St Albans and three neighbouring districts was undertaken in 2007. Large scale flood risk is not a significant constraint (when considered at a national scale); however, some parts of the district are susceptible to small scale flooding from various sources. For example in the upper Colne catchment London Colney was affected by flooding in September 1992 and Winter 2000/01; and Colney Heath in 1947, 1979, 1992, 1993 and 2000. The risk of flooding is also expected to increase with climate change. Therefore, it is important that appropriate planning control and management is achieved in the wider river basins in order to help reduce this risk.

In addition groundwater flooding has been experienced in the urban are of St Albans – for example Fishpool Street in December 2000; Beverly Gardens in April 2001; and Harper Lane in February 2006.

A Strategic Flood Risk Assessment (SFRA) covering St Albans and three neighbouring authorities was undertaken in 2018⁴. Appendix C of the SFRA identifies that the sources of fluvial flood risk in St Albans are "the River Lee in the north of the district, The Rivers Colne and Ver, and two tributaries of the Colne to the east, the Ellen and Butterwick Brooks." Surface water flood risk is "largely confined within the valleys of the Main Rivers and ordinary watercourses of St. Albans District, particularly within the rural areas". Groundwater flood risk is "concentrated in the floodplains of the Rivers Lee, Ver and Colne, as well as Butterwick and Ellen Brooks. Here, the chalk geology and gravel surface deposits can result in heightened groundwater levels at or just below the ground surface. The settlements identified as at highest risk of groundwater flooding are southern St. Albans, Marshalswick (St. Albans), Redbourn, Batford and Wheathampstead."

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⁴ South West Hertfordshire Level 1 Strategic Flood Risk Assessment, Final Report, October 2018. JBA Consulting.

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M6Q19 Appendix 4

Flood History

The SFRA states that "There are many recorded flood incidents in the district. With the exception of groundwater flooding recorded in the city itself, the majority of incidents are concentrated in the surrounding settlements. In particular, relatively regular fluvial and surface water flooding has been recorded in Wheathampstead, Colney Heath, London Colney and Batford".

Flood incidents have been recorded in several settlements, including Colney Heath (most recently in 2007), Batford (1998), Wheathampstead (2007), London Colney (2014), Redbourn (2014), Sandridge and Marshalswick (2001), St Albans (2016) and Harpenden (2015).

The risk of flooding is expected to increase with climate change. Therefore, it is important that appropriate planning control and management is achieved in the wider river basin districts in order to help reduce this risk.

..."

SA Report Appendix F

Policy S6 i) East Hemel Hempstead (North) Broad Location

3	Flood risk	Site is not in a flood risk zone. No predicted effects.					
		The 2018 SFRA considers the implications of climate change:					
		 It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. It identifies that some small parts of the site are classified as 'RoFSW⁵ + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design. 	1	-	ı	-	-

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⁵ Risk of Flooding from Surface Water

Policy S6 ii) East Hemel Hempstead (Central) Broad Location

3	Flood risk	Site is not in a flood risk zone. No predicted effects. The 2018 SFRA considers the implications of climate change: • It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. • It identifies that some small parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.	-	-	-	-	-
<u>Poli</u>	cy S6 iii) East He	mel Hempstead (South) Broad Location					
3	Flood risk	Site is not in a flood risk zone. No predicted effects. The 2018 SFRA considers the implications of climate change: • It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. • It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.	-	-	-	-	-
<u>Poli</u>	cy S6 iv) – North						
3	Flood risk	Site is not in a flood risk zone. No predicted effects. The 2018 SFRA considers the implications of climate change: • It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. • It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.	-	-	-	-	1
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. A Scheduled Monument, The Aubreys (fort/camp), is located approximately 0.75km to the north east of the site. Development could affect the setting of the Grade II Listed Buildings at Great Revel End Farm which is in close proximity to the north-east boundary of the site and also the Grade II Listed Buildings in Dacorum at Holtsmere Manor and Holtsmere End Farm.	-	-	-	?	?

D6 DRAFT

Update to the Assessment Summary

"...

Uncertain effects have been identified for the 'historic environment' objective as development could affect the settings of Listed Buildings which are in close proximity <u>and a scheduled monument</u>.

..."

Policy S6 v) East St Albans Broad Location

	T						
3	Flood risk	Approximately 1.5% of the site, in the north-east corner of the site (that has been identified as an education site), lies within in flood risk zones 2 and 3 relating to					
		Butterwick Brook and there would therefore be a potential flood risk for new					
		development. However, the majority of both the wider site and the education					
		allocation is in the lower risk flood zone 1 and therefore the flood risk area could be					
		avoided.	_	_	?	?	7
		The 2018 SFRA considers the implications of climate change:			•	-	-
		 It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. 					
		• It identifies that some parts of the site are classified as 'RoFSW + CC (1 in					
		100-year + 40% CC). These will need to be taken into account in future					
		masterplanning and detailed design.					

Policy S6 vi) North St Albans Broad Location

3	Flood risk	Site is not in a flood risk zone. No predicted effects.					
		The 2018 SFRA considers the implications of climate change:					
		 It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design. 	-	-	-	-	-
10	Historic	The site is not subject to any significant heritage or archaeological constraint. The					
	environment	Childwickbury Conservation Area is approximately 400m to the north west of the site;	_	_	- 2	- 2	- 2
		the 'Beech Bottom entrenchment' Scheduled Monument is approx. 250m to the south			-	-	-

of the site; and the 'Moated Manorial site' Scheduled Monument is approx. 800m to

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	the west of the site. In addition the Sandridge Conservation Area (and associated			
	listed buildings) is approx. 1km to the north east of the site.			
	No predicted effects. Effects are uncertain.			

Update to the Assessment Summary

``...

There is uncertainty as to the effects against the 'historic environment' objective, given the heritage assets and their settings which are located near to this Broad Location.

..."

Policy S6 vii) North East Harpenden Broad Location

3	Flood risk	 The site is adjacent to the flood zone of the River Lea, which runs on the other side of the Lower Luton Road, although there is a very small area of flood zone 2 encroaching onto the site. The 2018 SFRA considers the implications of climate change: It shows that the same very small area of the site lies in `Flood Zone 3 + 70%CC'. It identifies that some small parts of the site are classified as `RoFSW + CC (1 in 100-year + 40% CC)^{6'}. These will need to be taken into account in future masterplanning and detailed design. 	-	-	?	?	?
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. The Red Cow PH Grade II Listed Building is in close proximity to the site. The Mackerye End Conservation Area (with associated listed buildings, including Grade I Mackereye End) is approx. 500m to the east of the site. No predicted effects. Minor adverse effects are predicted.	-	-	- <u>*</u>	- <u>*</u>	- <u>*</u>

⁶ Risk of Flooding from Surface Water

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Update to the Assessment Summary

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Minor adverse effects have been predicted against the 'historic environment' objective, given the heritage assets and their settings which are located near to this Broad Location.

..."

Policy S6 viii) North West Harpenden Broad Location

3	Flood risk	Site is not in a flood risk zone. No predicted effects.					
		The 2018 SFRA considers the implications of climate change:					
		 It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. It identifies that some very small parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design. 	, -	-	-	-	-
10	Historic environment	The site contains the Grade 2 Listed Building at Cooters End Farm and development could impact on its settings. The Old Bell PH (Grade 2) is also close to the site. Minor adverse effects are therefore predicted.	-	-	구 <u>*</u>	구 <u>×</u>	÷ <u>≭</u>

Update to the Assessment Summary

"...

There is uncertainty in relation to the Minor adverse effects on the 'historic environment' are predicted as the site contains the Grade 2 Listed Building at Cooters End Farm and could impact on its settings. The Old Bell PH (Grade 2) is also close to the site.

..."

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Policy S6 ix) West of London Colney Broad Location

3	Flood risk	Just over 1% of the site, near the southern boundary of the associated education site, is in flood zone 2 associated with the River Colne. However, the whole of the housing area and the majority of the education site are in in the lower risk flood zone 1 and therefore the flood risk area could be avoided. The 2018 SFRA considers the implications of climate change: • It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. • It identifies that some parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in future masterplanning and detailed design.	-	-	?	?	?
10	Historic environment	Development at this location could affect the setting of Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area and which is situated adjacent to the north of the area identified for housing and partly within the area identified as an education site. In addition, the 'Colne Chapel moated site' Scheduled Ancient Monument is situated to the south of the site and development could affect its setting. The Grade II* Listed Building 'All Saints Pastoral Centre and Chapel' and the Grade II Listed Buildings 'London Coal Duty Marker on E side of Broad Colney Bridge', 'Voluntary Mission Movement' and 'Farm Cottage & adjoining garden walls at All Saints Pastoral Centre' are also situated to the south of the site and could have their settings affected.	P	L	×	×	×

Update to the Assessment Summary

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Further adverse effects were identified for the 'historic environment' objective as development at this location could affect the setting of Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area and which is situated adjacent to the north of the area identified for housing and partly within the area identified as an education site. In addition, the 'Colne Chapel moated site' Scheduled Ancient Monument is situated to the south of the site and development could affect its setting.

...'

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Policy S6 x) West of Chiswell Green Broad Location

3 F	Flood risk	Area is not in a flood risk zone. No predicted effects.					
		The 2018 SFRA considers the implications of climate change:					
		 It shows that none of the site lies in 'Flood Zone 3 + 70%CC'. 	-	-	-	-	-
		• It identifies that none of the site is classified as 'RoFSW + CC (1 in 100-year					
		<u>+ 40% CC).</u>					

Policy S6 xi) Park Street Garden Village Broad Location

3	Flood risk	Approximately 7.5% of the site is in the flood risk zones 2 and 3 associated with the River Ver which runs through the north west corner of the site. There would therefore be a flood risk for new development. However, the Local Plan Policies Map indicates that the north-west area of the site is allocated for 'L18 Transport Strategy (improvements in Green Belt)' (of which approximately 25% is in flood zones). As the majority of the site is in the lower risk flood zone 1 the flood risk area could be avoided for new built development. The 2018 SFRA considers the implications of climate change: • It shows that the area of site which lies in 'Flood Zone 3 + 70%CC' is the	Р	-	sc	×	ЗC
		same as that which is currently in flood risk zone 3.					
		• It identifies that some additional parts of the site are classified as 'RoFSW + CC (1 in 100-year + 40% CC). These will need to be taken into account in					
		future masterplanning and detailed design.					

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7	Air quality	PSGV: The site is relatively accessible to some services, facilities and open space which should help reduce the need to travel and minimise increases in airborne emissions. Development of new neighbourhood and local centres will further support this. The site is next to a rail station with direct connection to Watford & St Albans. In addition the rail-related improvements that would be associated with this site could help to reduce car usage and limit the increase in airborne emissions in the wider subregion. The requirement to deliver a local bypass route for Park Street is likely to reduce traffic levels in Park Street and Frogmore, with associated benefits for local air quality.	Р	L	√	1	✓
		PSGV : This site is located some distance from the city/town centres (St Albans and Watford) which will result in additional vehicle trips with associated airborne emissions. Development in this location could exacerbate air quality issues in 'St Albans AQMA No.3' which encompasses a number of domestic properties in Frogmore on Radlett Road and Colney Street in the vicinity of the M25.	Р	L	×	×	×
	T			1			
8	Use of brownfield sites	Part of the site is previously developed land. The majority of the site area is not classified as previously developed land. Minor adverse effects have therefore been predicted.	-	-	⊋ <u>≭</u>	구 <u>*</u>	구 <u>*</u>
10	Historic environment	The site is not subject to any significant heritage or archaeological constraint. A relatively small area near the western boundary of the site lies within the Park Street and Frogmore Conservation Area and there is a Grade II Listed Building (Toll Cottage, Burydell Lane, Park Street) in the same area of the site. In the north of the site there is also the Grade II listed Allan-Williams Turret. The settings of these heritage assets may be affected by any new development, although the topography and existing screening should minimise any adverse effects. The prior gravel extraction on the site will already have destroyed any archaeological remains – if they existed. Development could affect the settings of the 'Colne Chapel moated site' Scheduled Ancient Monument and Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area – both of which are on the other side of the railway to this site. Given the heritage assets, and their settings, which could be affected by the development of PSGV, minor adverse effects are predicted.	-	-	7 <u>x</u>	? ×	구 <u>*</u>

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12	Health	PSGV : The development is required to provide <u>a new Country Park</u> , countryside access links including improved footpaths, as well as walking and cycling links. These will provide the opportunity for new residents to live active lifestyles. In addition, the level nature of the site and its surrounding area make walking and cycling viable options.	P	L	✓	✓	✓
		An oil pipeline crosses the northern section of the site and would need to be taken into consideration in planning the layout of development. The southern part of the site is close to the M25 motorway and there could therefore be noise disturbance for the new residents.	-	-	?	?	?

Update to the Assessment Summary

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As part of the majority of the site is not classified as previously developed land uncertain minor adverse effects have also been identified for the 'use of brownfield sites' objective.

...

There is uncertainty as to the Minor adverse effects on the 'historic environment' objective have been predicted as a relatively small area near the western boundary of the site lies within the Park Street and Frogmore Conservation Area and there is a Grade II Listed Building (Toll Cottage, Burydell Lane, Park Street) in the same area of the site. The settings of these heritage assets may be affected by any new development, although the topography and existing screening should minimise any adverse effects. Development could also affect the settings of the 'Colne Chapel moated site' Scheduled Ancient Monument and Napsbury Park which is designated as a Registered Historic Park and Garden and a Conservation Area – both of which are on the other side of the railway to this site.

..."

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