

ST ALBANS CITY AND DISTRICT LOCAL PLAN EXAMINATION

MATTER 7:

THE BROAD LOCATIONS FOR DEVELOPMENT – SPECIFIC MATTERS (POLICY S6 (I) TO (XI)

PARK STREET GARDEN VILLAGE POLICY S6 (XI)

**ON BEHALF OF: BLOOR HOMES AND THE DEPARTMENT OF HEALTH
AND SOCIAL CARE**

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DESIGN | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

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Introduction

Pegasus is instructed by Bloor Homes and the Department of Health and Social Care to submit a Statement in respect of Matter 7, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 4
- Matter 5
- Matter 6
- Matter 8

Pegasus previously submitted representations in response to the Reg 19 Publication Plan in October 2018 and the Draft Issues and Options and Call for Sites in February 2018. The Hearing Statements should be read alongside our representations and supporting evidence.

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7. MATTER 7 – THE BROAD LOCATIONS FOR DEVELOPMENT – SPECIFIC MATTERS (POLICY S6 (I) TO (XI))

Park Street Garden Village S6 (xi)

(A new garden village to help deliver changes to the services on the Abbey Railway Line and provide a new secondary school)

7.1 Is the site suitable for housing and are there any specific constraints or requirements associated with it, or the need for mitigation measures?

- 7.1.1 Pegasus have objected to the site being proposed in the Plan for a Garden Village. Our objections are to the principle of development at this location and consequently our response is confined to the initial questions.
- 7.1.2 There is no justification or evidence to support the inclusion of the Park Street Garden Village, a site which is located in the Green Belt, and has permission granted on appeal by the Secretary of State for a SRFI which is in the national interest.
- 7.1.3 The Council's letter to the Secretary of State on 30th January 2018 confirms the reliance upon the evidence of the previous SLP to support the new LP this includes the Green Belt review dated 2013 and 2014.
- 7.1.4 The Council's evidence base does not include an up-to-date Green Belt Review to support the proposed development of Park Street Garden Village. The Council's evidence base relies on the Green Belt Review of November 2013, which does not support the proposed allocation of Park Street Garden Village (i.e. land which has permission for the SRFI).
- 7.1.5 Neither is there any discussion on the Duty to Co-operate. Consequently, the strategy is not justified in accordance with national guidance and is therefore unsound.
- 7.1.6 In our representations we questioned the evidence as the parcel of land relevant to the proposed Park Street Garden Village in the Green Belt Review of 2013 is GB30, overall this parcel contributes significantly to 3 of the 5 purposes.
- 7.1.7 In this respect the Plan is not justified or consistent with national policy as exceptional circumstances have not been demonstrated to support the inclusion of Park Street Garden Village.

- 7.1.8 Pegasus consider that there are reasonable alternatives to accommodate future housing need which have not been considered in the preparation of the Plan. We have provided evidence in our representations to demonstrate that there is reasonable alternative which does not compromise the national interest and only contributes significantly to 1 of the 5 purposes of the Green Belt. It is acknowledged that it is not appropriate to refer to omission sites in these Hearing Statements, but suffice to say a considerable amount of technical work including an appraisal of the Green Belt has been undertaken to support the promotion of the site to the Council.
- 7.1.9 It is clear from the Secretary of State's decision letter for the SRFI (paragraph of the Secretary of State's decision 14th July 2014) that the proposal would:
- be inappropriate development in the Green Belt, as such it would be harmful to the purposes of the Green Belt.
 - have a substantial impact on the openness of the Green Belt and that it would result in significant encroachment into the countryside,
 - would contribute to urban sprawl and that it would cause harm to the setting of St Albans,
- 7.1.10 All of these issues would apply to the Park Street Garden Village.
- 7.1.11 It was the overriding national need for a SRFI in this location that led to the Secretary of State's decision. His decision cannot simply be applied to the proposed Park Street Garden Village.
- 7.1.12 It is considered that not all reasonable alternatives have been considered and consequently the Sustainability Assessment is flawed and the Plan is unsound.
- 7.2 What are the implications of providing a new garden village on the site of an approved Strategic Rail Freight Interchange and how have these been dealt with?**
- 7.2.1 The Radlett site has permission for Strategic Rail Freight Interchange that was granted on appeal by the Secretary of State in July 2014. The appeal was recovered by the Secretary of State because it was a proposal for development of major importance having more than local significant and because it was for significant development in the Green Belt. The overring need for a SRFI in this location led to the Secretary of State's decision.

- 7.2.2 Paragraph 53 of the Secretary of State's decision is clear that there are very special circumstances which exist for the Strategic Rail Freight Interchange in this location in the Green Belt.

"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, to which he has attributed very considerable weight, 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. He has also taken account of 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. Despite the Secretary of State's conclusion that the scheme gives rise to conflict with LP policies 104 and 106 in the light of his finding that very special circumstances exist in this case he is satisfied that, overall the scheme is in overall accordance with the development plan."

- 7.2.3 The implications of providing a new garden village on the site of an approved Strategic Rail Freight Interchange have not been fully addressed by the Council.

- 7.2.4 The 12th June 2018 Planning Policy Committee paper item 10 Appendix A provides a resume of the proposed Park Street Garden village and the SFRI. It provides a summary of the existing planning permission for the SRFI. Appendix A states on page 8 (no para numbers, but second paragraph on the page)

"In order to be positively prepared the Local Plan strategy should seek to facilitate the SFRI. Having been identified as a project which meets a national objective, the NPPF indicates that this development should, in general terms, be facilitated."

- 7.2.5 The Appendix refers to the Green Belt review (2013) and the analysis of parcel GB30 which as we have referred to concludes that the overall contribution on parcel GB30 to the Green Belt is significant in terms of contribution to 3 of the 5 purposes of the Green Belt. Nevertheless the site is scored "Amber".

- 7.2.6 The Appendix states on page 9, the last paragraph that:

"The impact of 2,500 homes would likely have a broadly similar impact as the permitted 331,665 sq.m. of warehousing."

7.2.7 However, no evidence is provided to support this statement.

7.2.8 Page 14 of Appendix A (10th June 2018 PCC meeting) provides the re-evaluation of the SRFI site and states on page 15 (third paragraph) states that:

"...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 SRFI site and prevents delivery of the SRFI."

7.2.9 Page 18 of Appendix A refers to alternative housing and development strategy options and effects of difference strategies tested against the current proposed strategy. Other strategy options were identified:

- North East Redbourn
- Using Red rated sites
- Different trajectories
- Other LPA's delivering development
- Neighbourhood Plans
- Development of a smaller number of sites currently in the Green Belt

7.2.10 Only North East of Redbourn has been subject to the SA, none of the other alternatives have been assessed.

7.2.11 Yet the Council conclude on page 19 of Appendix A:

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 (SRFI 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.

7.2.12 This conclusion is not based on an assessment through the SA process.

7.2.13 It is only after the consultation on the Submission version of the Plan in October 2018, in response to representations made during that consultation that Addendum to the SA, (which has not been the subject of public consultation) was produced in March 2019. Table 4.1 of the Addendum SA (CD012) sets out the key differences on the assessment findings. It can be seen that the SRFI has more significantly positive effects than the Garden Village.

7.2.14 A Final Report by Hatch Regeneris 5 September 2019 (EMP) assumes that the SRFI will not proceed (paragraph 8.8) states:

"If this development was included the industrial space with permission would increase dramatically by 331,665 sq m (mostly very large warehousing). For the purpose of this study we assume that the development will not go ahead and is therefore excluded from the supply. If it did come forward, this would be sufficient to meet all of the strategic demand for industrial space in the FEMA."

7.2.15 Paragraph 10.9 of the report concludes that:

"A combination of growing demand and the loss of existing premises has resulted in a significant reduction in the availability of employment space in South West Herts. The availability rate has fallen by 11 percentage points for office space and by over 12 percentage points for industrial space since 2010 and is now at critically low levels in several key locations (e.g. industrial space in Dacorum, office space in

St Albans). This has the potential to act as a significant constraint on growth, particularly in those office-based sectors which are key to increasing productivity."

- 7.2.16 The report concludes for industrial space (481,500 sq m between 2018 and 2036 is needed) this is based on past trends in the take-up in South West Herts. This target is not aligned with any of the labour-demand or supply-led scenarios and marks a significant uplift on the estimates from the 2016 study. However, it is considered appropriate (paragraph 10.18) and *"justified by the consistently strong levels of demand for industrial space in South West Herts, which could have been even higher if the market was not undersupplied."*
- 7.2.17 The following questions are matters of detail more appropriately addressed by the Council.
- 7.3 What evidence is there to demonstrate that the garden village is capable of delivering 2,300 dwellings (including 600 beyond the plan period)?**
- 7.4 What further infrastructure work (including technical and environmental studies) need to be undertaken, and is this appropriate to be left to the masterplanning stage?**
- 7.5 What is the justification for the substantial new Country Park and have its financial implications been considered?**
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