

Home Builders Federation

Matter 3

ST ALBANS LOCAL PLAN EXAMINATION

Matter 3: Spatial Strategy, Settlement Hierarchy and Development Strategy

Whether the Spatial Strategy, Settlement Hierarchy and Development Strategy is justified, effective and consistent with national policy.

1. What is the basis for the overall spatial strategy and broad distribution of growth set out in policy S1? What options were considered and why was this chosen?

No comment

2. Is the growth in large villages consistent with their position in the settlement hierarchy set out in policy S1?

No comment

3. Has the settlement hierarchy taken account of facilities in neighbouring settlements, outside of the local authority's boundary? If not, should it?

No comment

4. Does the Plan clearly set out the approach to be taken to proposed development in the countryside? If not, should it?

Given that the all of the countryside is designated as Green Belt we consider the policies governing that designation as set out in paragraphs 143 to 147 of the NPPF are sufficient. Additional policy requirements regarding development in the Countryside within policies S1, S2 or S3 would only add to confusion for the decision maker.

5. Is there a need to define settlement boundaries?



The amended Green Belt boundary will define the boundary around each settlement, including the proposed allocations within the District. As such we would suggest that a separate boundary is unnecessary.

6. Is the proposed development strategy set out in policy S2 appropriate and realistic?

Our principle concerns are that the development strategy:

- does not go far enough in meeting needs; and
- offers little in the way of flexibility should any of the allocations proposed in the plan not come forward as expected.

As we set out across our statements the Council must look at whether it can meet the needs of neighbouring areas as required by paragraphs 11 and 60 of the NPPF. We recognise that this requirement is caveated in paragraph 11 which states that needs may not be met in full where:

*“i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

We do not consider the Council's evidence to provide the strong reasons why the application of Green Belt policy should not allow SCADC from meeting some of the unmet needs arising in neighbouring areas. We do not consider the Council to have had sufficient regard to their own evidence on Green Belt, which we consider in more detail in our matter 5 statement, nor to have undertaken the appropriate further actions in testing smaller-scale areas of the Green Belt with regard to meeting the needs of other areas. Instead the Council alighted quickly on a strategy that only looks to meet their own needs. We consider there to be opportunities within SACDC to meet the needs of other areas and the Council has not demonstrated that there are any significant and demonstrable adverse impacts from further allocations and that there are no strong reasons, on the basis of the Council's evidence, for restricting development to the levels set out in S2. We therefore do not consider the strategy to be the appropriate strategy with regard to addressing the unmet needs of other areas as required by the NPPF.

Aside from the requirement to meet the needs of neighbouring areas the Council has also prepared a plan that has very little flexibility. The Council have prepared a plan that it expects to deliver 14,871 homes across the plan period – a buffer of just 221 homes (1.5%). Regardless of the development strategy being proposed such a buffer is insufficient and takes no account of the fact that development is unlikely to be delivered as expected by the Council. If the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan

requirements to be surpassed. For this reason, the HBF recommends that a 20% buffer in the Council's overall housing supply is necessary to ensure its housing requirement is met.

However, the development strategy being proposed compounds the lack of a buffer between needs and planned supply as it seeks to deliver 68% of its expected supply on just 10 strategic allocations. Whilst we support these allocations and steps the Council have taken in meeting needs such an approach provides very little flexibility should delivery not go as expected on any of these sites. There is a very real risk that lengthy master planning processes and the resolution of complex infrastructure requirements alongside delays in decision making on both applications and pre commencement conditions could see development come forward much later than expected.

To offset such delays, which could see a proportion of development on larger sites come forward after the end of this plan period, it is important to have a supply of smaller sites that will delivery across the whole plan period. To achieve this the Council should have looked to amend Green Belt boundaries to allow the allocation of smaller sites on the edge of sustainable settlements. The fact that the Council have not done so is surprising given that the Council's Green Belt Assessment identified further smaller-scale sub areas within the Green Belt that could have been released without compromising the integrity of the Green Belt in SACDC in meeting its purposes. We would suggest that the failure to allocate such land for development is wholly inappropriate and that a supply of smaller sites is essential to have a balanced development strategy that will give greater certainty that needs will be met in full.

We would therefore suggest that the development strategy set out in S2 is neither consistent with national policy justified or effective. The Council must amend its strategy to include smaller sites that will meet some of the unmet needs arising in neighbouring areas as required by paragraph 60 of the NPPF. The allocation of such sites will also provide the flexibility within the plan to ensure that any changes in delivery expectations do not derail the objectives of this plan.

7. Will this provide a sufficient mix of sites and provide the size, type and tenure of housing to meet the needs of different groups in the community? Does this reflect the evidence from a local housing needs assessment?

The most effective way to meet the broad mix of homes that are required in any area is to allocate a range of sites that vary in size and location. A variety of sites ensures that range of developers can operate within the district which will inevitably deliver the mix of homes demanded by the market. By looking to meet needs principally through the allocation of fewer larger sites the Council will inevitably limit the pool of developers operating within SACDC and limit the variety of homes that come forward.

8. Should the Plan include some small and medium size sites in order to provide greater choice and flexibility and accord with NPPF paragraph 68?

Yes. Firstly, in order to comply with part a of paragraph 68 the Council will need to identify those sites of less than 1ha that will deliver at least 10% of their housing needs. We could not find any evidence relating to this type of provision and given the Government's commitment to supporting SME house builders it is important that this policy requirement is addressed in full.

9. Does this strategy rely on windfall housing and if so, is this made clear in the Plan and is it based on the advice in paragraph 70 of the NPPF?

In order to meet its housing requirement, the Council's housing trajectory in appendix 2 of the local plan indicates that windfall development which makes up 12% of planned supply. If this level of windfall does not come forward, the Council will not meet its housing requirement for the plan period. However, we could find not find any evidence presented by the Council in its supporting evidence to justify its position. Paragraph 70 is clear that compelling evidence is required to support the inclusion of windfall within the housing trajectory and without it no allowance should be included.

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