

St Albans City and District Council  
Shaping our Community  
Core Strategy Consultation on the Strategy for Locating Future Development in the District  
December 2010

CPRE Hertfordshire Response to On-Line Survey submitted on 2<sup>nd</sup> February 2011

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Q1. The strategy for locating future development in the District sets out that most development will be located in the main urban areas, because these are the most sustainable locations for development, as they contain the widest range of services and facilities.

To what extent do you support the overall strategy for the District?

*CPRE Hertfordshire Response: Tend to support*

Q2. The Council wishes to see the provision of new and improved infrastructure such as schools and transport and non-residential proposals such as improved shopping and local jobs. This would maintain and improve the quality of life for residents, now and in the future.

To what extent do you support the proposals in Section 4?

*CPRE Hertfordshire Response: Tend to oppose*

Q3. In order to protect the Green Belt and prevent the risk of coalescence with adjoining urban areas, the Council proposes to reduce the local housing target from the (to be abolished East of England Plan target of 360 per year to a new local housing target of 250 per year.

To what extent do you support this reduction?

*CPRE Hertfordshire Response: Neither support nor oppose*

Q4. In recognition of the high demand for affordable homes in the District, the Council aims to deliver 100 affordable homes per year, including social rented, key worker and shared ownership homes, whilst reducing overall development.

Do you consider this figure to be about right, much too high, a little high a little low or much too low?

*CPRE Hertfordshire Response: Don't know*

Q5. The Council is seeking to decrease the overall number of houses developed, whilst at the same time increasing the number of affordable homes built. To achieve this, the Council is proposing:

- Increasing the proportion of affordable housing sought on housing developments from 35% to 40%
- Seeking contributions to affordable housing from all new housing (reducing the site threshold from 15 dwellings to one)
- Increasing building of affordable housing on Council owned land.

To what extent do you support these ways of increasing affordable housing?

*CPRE Hertfordshire Response: Neither support nor oppose*

Q6. To what extent do you support the concept 'There is current shortage of primary and secondary school places throughout the District. In providing for such need, if no non-Green Belt locations are available, should Green Belt locations be considered'?

*CPRE Hertfordshire Response: Tend to oppose*

Q7. To what extent do you support the concept 'There should be flexibility with regard to previously developed land/brownfield sites within the Green Belt, where modest expansion may be appropriate'?

*CPRE Hertfordshire Response: Neither support nor oppose*

Q8. To what extent do you support the concept 'Where educational establishments in the Green Belt can demonstrate a real need to provide improved facilities and to expand, should future housing growth at these locations be considered, as enabling development to provide educational improvements'?

*CPRE Hertfordshire Response: Strongly oppose*

Q9. To what extent do you support the concept 'There is a current shortage of housing and care facilities for the growing elderly population. In providing for such needs, if no non-Green Belt locations are available, should Green Belt locations be considered'?

*CPRE Hertfordshire Response: Tend to oppose*

Q10a. To what extent do you support the concept 'New high quality employment opportunities, especially green businesses supporting sustainable technologies, should be encouraged in the District'?

*CPRE Hertfordshire Response: Don't know*

Q10b. If such a concept was supported, where should this be located

*CPRE Hertfordshire Response: none stated*

Q11. If you have any further comments on this consultation, please make them here (max 50 words)

*CPRE Hertfordshire Response:*

*Lack of opportunity provided to make comments on individual questions or explain concerns, and a word limit response to this question is not an adequate alternative.*

*CPRE Hertfordshire wishes to raise such concerns in respect of:*

- 1) Inappropriate enabling development in the Green Belt;*

- 2) *The presumption in the consultation document that additional capacity for schools and colleges (including Oaklands) can only be met by 'expansion' (undefined) or 'new' development in the case of Green Belt sites;*
- 3) *The extent of the proof to be required from organisations to demonstrate that development in the Green Belt for the elderly, education or 'enabling' purposes comprises 'very special circumstances' as demanded by Government planning policy in PPG 2. The stated 'over-riding priority is still to protect the Green Belt' in the Foreword, is inconsistent with the willingness to consider a strategy that is contrary to 'standard Green Belt policy' in respect of the above developments.*

*CPRE Hertfordshire nevertheless supports the Council's proposal to exclude from the Core Strategy the major development proposals in the Green Belt previously put forward.*

*We request an opportunity (not adequately provided by the scope of this questionnaire) to properly set out and explain the above concerns before the Council prepares the Pre-Submission Core Strategy.*

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We subsequently submitted further comments to John Chapman at St Albans City and District Council by email dated 25<sup>th</sup> February 2011.

- 1) *On inappropriate 'enabling development' in the Green Belt, our concern relates to the question at the end of Section 6 of the consultation document on whether enabling development in the form of housing should be permitted in the Green Belt, in effect to fund educational facilities. Given that such development would be 'inappropriate' as defined by PPG2, there is a presumption against such action, and the Core Strategy should not therefore facilitate this. It should continue to be the responsibility of any developer (including education establishments) to prove that 'very special circumstances' apply to their specific proposal, that outweigh the presumption against development, and the harm that would be caused, and this should be made clear by the Core Strategy and development management policies.*
- 2) *Our concern about the apparent presumption in the consultation document that additional and improved capacity at schools and colleges in the Green Belt can only be met by 'expansion', relates to Section 4 in the final boxes on 'Educational issues' and 'Educational proposals'. In Green Belt locations 'expansion' of buildings and structures that would impact on openness should always be the last resort, and there should be a requirement for the developer to prove that all other means of providing improved capacity are unachievable within existing or replacement buildings within the existing built footprint of the relevant establishment, before any such proposal is included in a development plan document, as well as a requirement to pass the 'very special circumstances' test at the planning application stage if the site remains within the Green Belt.*
- 3) *Our third concern relates the question at the end of Section 6 in the consultation document on health-related facilities and housing for the elderly in the Green Belt. Consistent with our comments above, our view is that the extent of proof to be required to justify development in the Green Belt should be similar to that needed for any development that is by definition 'inappropriate' in terms of Green Belt policy.*