

Standing up for Hertfordshire's countryside

Spatial Planning Team
St. Albans City and District Council
Civic Centre,
St Peters Street,
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Our Ref:

Your Ref:

21st February 2018 (by email)

Dear Sir/Madam

Local Plan Questionnaire - Feb 2018

This is CPRE Hertfordshire's response to the Local Plan consultation based on the 'Have Your Say' leaflet dated Jan 2018.

We also attach a copy of our letter dated 9th February to the Chief Executive (and copied to Head of Planning) which raises concerns about the some of the information and wording of questions in the leaflet.

Question 1

Getting our Priorities Right

All of these aims, except *Provide local jobs* (on which we comment under Q.6), are equally important and cannot be ranked in the simplistic way suggested.

The fundamental aim of the Local Plan, in accordance with paragraph 14/footnote 9 of the National Planning Policy Framework, should be to make a balanced judgement, based on justifiable evidence, between the need for development on the one hand and the impact of doing so on the natural and built environment on the other, so as not to cause irrevocable harm.

Getting the required transport, schools and other infrastructure in place to meet the needs generated by development should be a given.

Build homes in the right place

We accept that there is a need for more homes in the District, but there are fundamental questions to be addressed about the kind of dwellings to be built and where they should go. The first requirement is to differentiate between what is genuine need and what is market demand.

The 5th bullet point under the heading *It's worth knowing* is misleading where it states that the Government requires the District to build 913 homes a year. This figure is not set in

stone: it is an illustrative figure published as part of the Government's initial analysis of the proposed new standard housing needs assessment methodology presented in the consultation document *Planning for the right homes in the right places* (DCLG, September 2017).

Whether the new methodology will be adopted is not likely to be known until the revised National Planning Policy Framework is published later this year. We expand on this in the attached letter dated 9 February 2018 sent to the Chief Executive and copied to the Head of Planning & Building Control.

This so-called Issues and Options consultation is based on the misleading premise that 913 homes a year must be built, and is therefore invalid. Even if that figure, or something like it, is eventually accepted as the 'objectively assessed need', the Council is required, in accordance with paragraph 14 of the NPPF, to take into account specific policies in the NPPF such as Green Belt that indicate development should be restricted, before setting its housing target.

The 4th bullet point implies that large-scale development on Green Belt should be permitted because it generates planning gain that cannot easily be obtained otherwise. We do not accept that this constitutes a 'very special circumstance' for releasing land from the Green Belt.

With regard to the 1st bullet point, we question whether the Council has identified all the brownfield land in the District, particularly in view of the current exercise of producing Brownfield Land Registers. (We comment on this in more detail in our response to the Call for Sites consultation.)

Questions 2/3

Five ways we can build more homes

We agree entirely with the first option of adding more homes into existing built-up areas.

We disagree with the second option as worded because it pre-supposes that the 8 strategic sub areas identified in the SKM Green Belt Review, taken together, are the ones that least meet Green Belt purposes. We accept in principle that, if any land is to be removed from the Green Belt, it should be that which contributes least to meeting Green Belt purposes. In the absence of justification for so many dwellings to be built in the Green Belt, it is pointless at this stage to be seeking comparative assessments between the remaining three options of extending existing towns or villages into the Green Belt or creating new settlements in the Green Belt.

However, of these options, creating 'garden villages' in the Green Belt is by far the worst because there is no suitable area in the District where a truly sustainable stand-alone settlement could be located. If it was concluded that housing need could not be accommodated in the District due to physical or policy constraints, consideration should be given, by means of collaboration between a number of planning authorities, to meeting that

need beyond the Metropolitan Green Belt and possibly in the Oxford-Cambridge arc, as recently postulated by Government.

The analysis of the results of this consultation can be given little credence because of the misleading information on which answers will have been based.

Questions 4/5

Build the right kind of homes - Eight kinds of home we need to provide

All of these types of housing are necessary, but only a strategic housing market assessment based on need rather than demand will determine how many of each kind are actually needed. Only social rented housing, affordable rented housing and part-buy/part-rented housing will make a real contribution to meeting genuine housing need. 'Affordable' housing resulting from market housing development is unlikely to be affordable for local people because house prices in the District are so high. The idea that building more and more market housing will bring house prices down to affordable levels is highly speculative.

Question 6

Approach to providing local jobs

Public opinion is always likely to favour new jobs being created, without actually understanding the dynamics of such an unconstrained policy or its effects on the environment and the Green Belt.

CPRE Hertfordshire strongly opposes economic development in the Green Belt which has the effect of drawing more people to live in the area. St Albans District is a high employment area, and it is a fact of life that a relatively high proportion of jobs involve commuting into London. Because of the gradient between house prices (values) in London and those in the District, there is a strong tendency for people to move out of London into the District without necessarily giving up their jobs in London. The ramifications of any shift in the current balance between local employment and commuting need careful consideration if we are to avoid a situation where more jobs leads to more in-migration, requiring even more housing and associated infrastructure to be provided in the Green Belt.

National Planning Policy is to constrain development of all types in the Green Belt around London - that is the primary purpose of the Metropolitan Green Belt and the reason it was intended to be permanent.

Question 7

Approach to identifying potential land for building in the Green Belt

We are highly critical of the biased way in which this issue has been presented. Firstly, it inaccurately paraphrases the five Green Belt purposes set out clearly in paragraph 80 of the NPPF.

Secondly, it is based on the false presumption that up to 10,000 additional dwellings will have to be built in the Green Belt (according to the preface to Questions 2/3). One of the stated aims in Question 1 is to Protect the Green Belt, but by promoting development on land that is 'least good' at meeting Green belt purposes (as opposed to not meeting those purposes), it negates that aim.

The inclusion of the 8 strategic sub areas in this section and on the 'Existing Evidence Base Diagram' at the end of the document, without giving any information about the likely capacity of those areas, is unjustified and misleading. Based on the estimates given by SKM, the capacity of those areas at the mid range of dwellings per hectare would be about 6,500. This leaves a shortfall of 3,000 or so dwellings to be found in the Green Belt, based on the Council's presumption. The uninformed public are not likely to realise this, resulting in a 'complacent' response to Question 7 from those who consider themselves unaffected by the 8 areas.

Question 8

Protecting our historic buildings, wildlife sites and areas of natural beauty

All of these features are worthy of protection equal to that for the Green Belt.

Question 9

Infrastructure we might need

Adequate infrastructure is necessary for sustainable living, but the facilities as listed are expressed misleadingly. For example, extra schools are not needed. Extra school capacity is needed and the Education Authority should be seeking to provide that extra capacity without building in the Green Belt. The same applies to Neighbourhood Centres, which are not needed if capacity is available within existing towns and villages.

Better public transport and improved cycling and walking facilities are urgently needed to support sustainable living. Less investment in new/improved roads and more car parking would be needed if alternative forms of transport were promoted and funded and if development was concentrated in and around existing towns and villages.

Yours sincerely,



Steve Baker
Planning Manager