

Standing up for Hertfordshire's countryside

Spatial Planning Team
St. Albans City and District Council
Civic Centre,
St Peters Street,
St Albans,
Hertfordshire, AL1 3JE

Our Ref:

Your Ref:

21st February 2018 (by email)

Dear Sir/Madam,

St Albans Local Plan - Call for Sites 2018

We are writing in response to the Council's current consultation on Call for Sites 2018 on the Council website, and the e-mail on the same topic which you sent to us on 9 January 2019, and to express our concerns about the way in which this consultation has been presented.

Firstly there is content on the web-page which is incorrect and may potentially mislead the public. The opening paragraph states that "The government now says we should build 913 homes a year. This would mean about 9-10,000 homes in the Green Belt." The Government does not say that: it has issued a methodology which may lead to a higher assessment of housing need, it does not insist that that figure is met.

Equally it does not automatically mean that there is a consequential need for 9 - 10,000 homes in the Green Belt. The Government has been consistent in stating that housing need alone is not sufficient to change Green Belt boundaries. Paragraph 14 of the National Planning Policy framework requires the Council to carry out a balance between the objectively assessed housing need and the constraints under which the Council has to operate. Footnote 9 is clear that Green belt designation is one of those constraints. Equally, Para. 044 of National Planning Practice Guidance makes it clear that Green Belt policies take precedence over housing and economic needs. The judgement in the case of *Calverton v. Nottingham City Council et al. (CO/4846/2014)* was clear that it is impermissible to conclude that housing need alone can constitute exceptional circumstances to justify the removal of land from the Green Belt for development.

Secondly we are concerned, in light of the above, that the Council say the 'next step' in the consideration of sites put forward will be a review of all options. It may have been better for the Council to have asked for suggestions for all potential development sites: Brownfield sites, underused land and buildings, (we would also like to see the Council include conversion of commercial properties to residential under the definition of 'brownfield') as well as just the Greenfield sites implied in the document. There should also be due consideration of optimised densities and co-operation with other authorities to meet identified development requirement. There is no need to defer these items until after the

Call for Sites. The work on these should be carried out in tandem. Indeed the information from them will impact directly on the number of homes which will be required from the Call for Sites responses. By approaching it in the current manner it could be construed that the Council is favouring Greenfield development and using Brownfield to top up the shortfall, which is completely contrary to Government policy.

The over-all thrust of the consultation document is to encourage the use of Green Belt land. 60% of the text specifically refers to Green Belt land and those responding are actively encouraged to propose "unique opportunities that might override the additional level of damage to Green Belt purposes." In our view this goes beyond what is appropriate in a consultation of this nature. In particular the Council's paragraph referring to "the additional level of damage to Green Belt purposes" and offsetting the impact by compensatory improvements to environmental quality or accessibility of remaining Green Belt land seems particularly inappropriate. Surely, the loss of Green Belt can't be compensated for by "improvements" to the remaining Green Belt? And there can't be "additional" damage to Green Belt purposes - if land meets one or more of the purposes, then development means there is harm to the Green Belt and very special circumstances need to exist to justify that.

Yours sincerely,



Steve Baker
Planning Manager