

St Stephen Parish Neighbourhood Plan – Housing Report

Introduction

This report forms part of the Evidence Base for the St Stephen Neighbourhood Plan, setting out the background to and methodology for the site assessment and proposed allocation process, which was undertaken as part of the St Stephen Neighbourhood Plan.

Having identified a local housing need, the Neighbourhood Plan has sought to identify suitable sites for residential development. This is against the backdrop of an adopted Local Plan dating to 1994, and an emerging Local Plan, which was anticipated to be adopted in 2020. Whilst the Neighbourhood Plan conforms to the adopted Local Plan, in light of the date of that document, it has also sought to synchronise itself with the evidence and content of the emerging Local Plan.

Beyond the settlement envelopes of the individual villages, St Stephen Parish falls entirely within the Green Belt. Work on the Neighbourhood Plan has sought to remove specific sites from the Green Belt, where they are no longer considered to meet the criteria for Green Belt, to enable the delivery of homes to meet an identified local need. This is an approach supported by the National Planning Policy Framework (NPPF) which, at paragraph 136¹, sets out the following:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”

The NPPF allows Neighbourhood Plans to amend Green Belt boundaries, but only where a need has been established through strategic policies, in this case the Local Plan for St Albans City and District. Discussions with planning officers at SADC throughout the Neighbourhood Plan process have confirmed that the emerging SADC Local Plan would have provided this strategic need.

However, the emerging Local Plan, anticipated to be adopted in or before 2020, has been found unsound in its Examination. On 1 September 2020, the Examiner recommended that either it is withdrawn by SADC or a recommendation to the Secretary of State will be that it is not adopted.

A decision on the way forward has not yet been made by SADC councillors. If the emerging Local Plan does not progress as originally scheduled, the strategic need to change Green Belt boundaries will not have been established. It should be noted that a strategic need is not contained in the current saved policies of SADC’s Local Plan Review 1994. Therefore, if SADC’s emerging Local Plan does not progress as anticipated, policies relating to the allocation of sites would not form part of the Submission Version St Stephen Parish Neighbourhood Plan.

The St Stephen Neighbourhood Plan, having been prepared in parallel to the emerging Local Plan, has sought to deliver sustainable development by contributing positively to the housing needs of the Parish, in the anticipation that the Local Plan would have been adopted prior to the Neighbourhood Plan. Whilst this is not the case, this report sets out the methodology that was pursued, and the findings of this.

¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Understanding local housing need

Having decided to develop a Neighbourhood Plan for the Parish of St Stephen, the Neighbourhood Plan Steering Group applied for technical support from Locality in order to commission AECOM to prepare a Local Housing Needs Assessment (HNA)². The purpose of this was to gather data at a more local level to help St. Stephen Parish Council (SSPC) understand, among other matters, the type, tenure and 'fair share' of housing quantity needed to inform neighbourhood plan policies and supply considerations.

The HNA, published in June 2017, estimated the quantity of housing needed in NPA according to five different sources; these are:

1. St. Albans Strategic Local Plan 2011-31 (Publication Draft), produces a target of **791 dwellings between 2017 and 2031 or 53 homes per year** (rounded).
2. SHMA - proportional share drawn from OAN produces a target of **807 dwellings over the plan period, or 54 per year**.
3. DCLG Household projections generate a target of dwellings of **1238, or 83 dwellings (rounded) over the plan period**.
4. Net home completion rates 2001-2011 produces a projection of **555 homes over the plan period or 37 dwellings each year**.
5. Net home completion rates 2011-2015 a projection of **285 homes over the plan period of 2017-2031**.

This is illustrated in Figure 1 below.

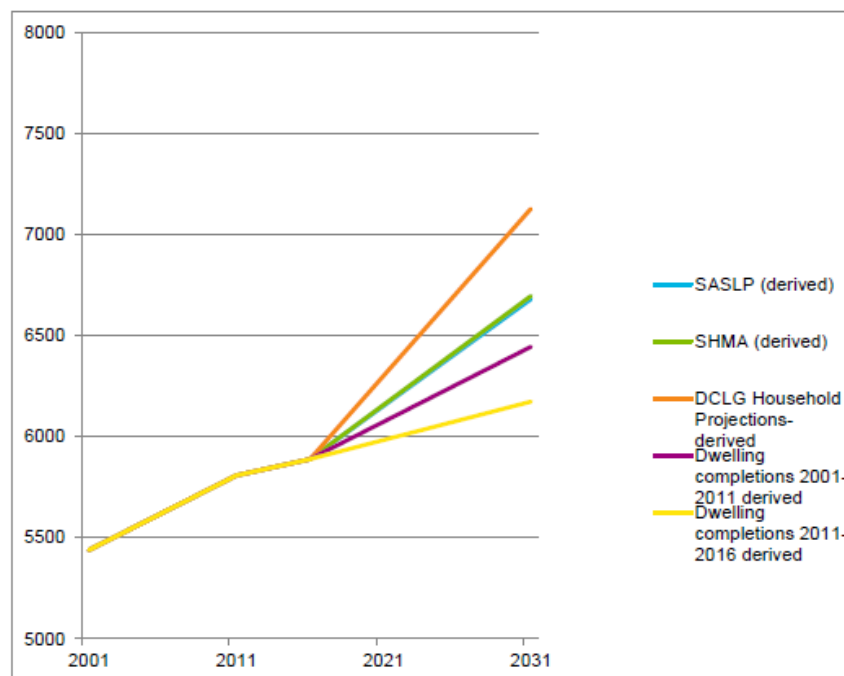


Figure 1: Graph to show dwelling projections from a number of sources

² See Housing Needs Assessment available at: <https://www.ststephenparishcouncil.gov.uk/neighbourhood-plan/>

Using this data an overall target of **between 875 – 900 dwellings** was established to be delivered over the Plan Period within the Neighbourhood Area.

The HNA also provided detail on the type and tenure of housing that should be provided in the area and concluded that there is a specific need for affordable housing (including private rental); younger family-sized homes of 2 to 3 bedrooms, which would also enable downsizing to free up larger properties for families needing more space; and homes suited to older people and independent living, including extra care provision.

These priorities have been reflected in the policies of the neighbourhood plan.

In parallel with the HNA, local residents were surveyed about their thoughts on housing provision in the parish. 11% of households responded to the survey, which revealed the following about housing:

- 76% of respondents wished to remain in the parish in the foreseeable future
- Types of housing sought were predominantly: bungalows, 2-3 bedroom properties, 4+ bedroom properties and warden assisted homes – illustrated in Figures 2 and 3.

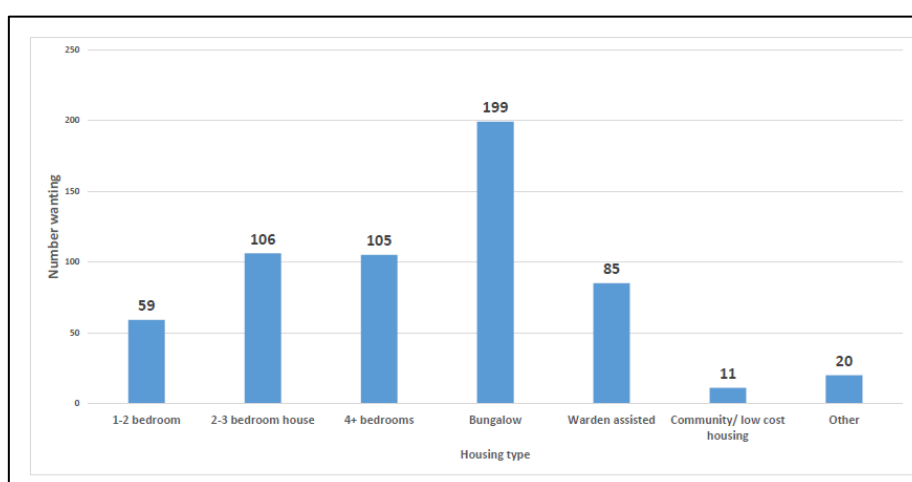


Figure 2: Housing sought by respondents for themselves

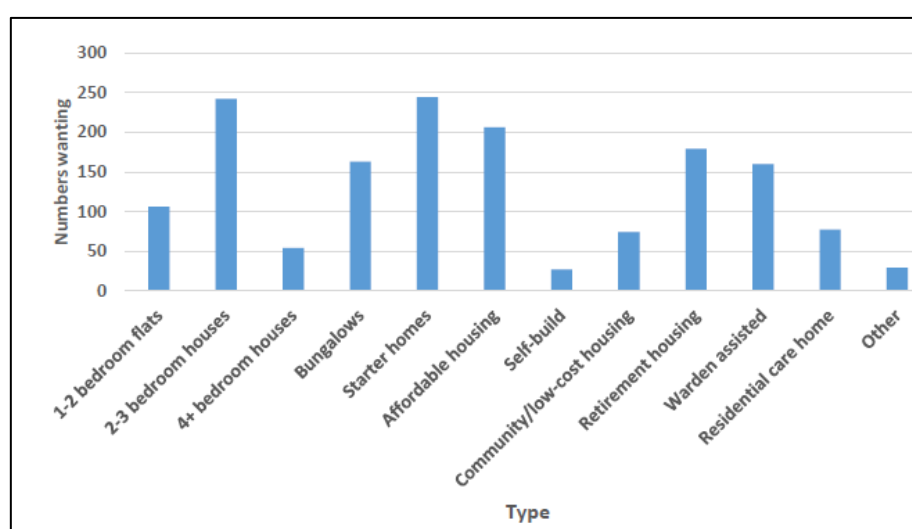


Figure 3: Housing sought by respondents for others in their family unit

Strategic context

The adopted Local Plan for St Albans City and District (SADC) comprises the Saved Policies of St Albans Local Plan Review, adopted in 1994.

In 2014, prior to the start of the work on the St Stephen Neighbourhood Plan, SADC published a new draft Strategic Local Plan³.

Following a period of consultation, an amended draft Strategic Local Plan and a Detailed Local Plan were published in 2016⁴. This emerging St Albans City & District Local Plan 2020-2036 (SADCLP) was anticipated to eventually replace the 1994 Local Plan Review.

The St Albans City & District Local Plan 2020-2036 (SADCLP) underwent Examination in late 2019 but subsequently the examination hearings were suspended in January 2020. The inspector expressed concerns in relation to legal compliance and soundness and stated that they would reflect further on the issues of legal compliance, duty to cooperate, spatial strategy and the Green Belt and subsequently issue a more detailed letter to SADCC.

Correspondence⁵ culminated in a letter from the Examiner⁶ to SADC, dated 1 September 2020 stating the following:

“The Council therefore have two options available to them. The Plan can be withdrawn from examination or we can write our report recommending that it not be adopted because of a failure to discharge the Duty to Cooperate. We appreciate that the Council may need to take some time to consider its preferred way forward, but we would be grateful if you would then advise us which route you wish to take.”

No decision has yet been made⁷, however, what is known is that until such a time as a new Local Plan is adopted, the saved policies of the Local Plan Review (1994) will continue to set the strategic context for the district.

³ https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/CD%20015%20St%20Albans%20Draft%20Strategic%20Local%20Plan%202014_tcm15-67033.pdf

⁴ https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/CD%20027%20Local%20Development%20Scheme%202017-2020_tcm15-67181.pdf

⁵ <https://www.stalbans.gov.uk/examination-documents>

⁶

<https://www.stalbans.gov.uk/sites/default/files/attachments/ED42%20%20Inspector%27s%20response%20to%20SADC%20letter%20ED41A%20.pdf>

⁷ As at 5 October 2020

St Stephen Parish Site assessment process

Step 1: Identifying sites to include in the assessment

The Neighbourhood Plan Steering Group issued a 'Call for Sites' in 2016, inviting anyone wishing to develop their land to send in details of this.

In addition to the sites submitted via the local Call for Sites, those sites submitted to St Albans City and District (SADC) as part of the District call for sites (in 2009 or 2016), often referred to as 'SHLAA sites', which were assessed as being 'suitable, available and achievable for development' were added to the long list.

Some of the sites submitted in the Local Call for Sites were duplicates of sites already submitted to St Albans.

Step 2: Developing criteria against which to assess the sites

The Steering Group applied for technical support from Locality to commission advice from AECOM on developing appropriate criteria with which to assess the sites.

They created a pro-forma based on the latest government guidance, to which a number of locally specific criteria were added including:

- Distance from the edge of the site to a water course; and
- Would proposed development involve land that could otherwise help to meet the objectives of Watling Chase Community Forest.

The pro-forma would collate a range of data about each site including:

- Background information:
 - Site location and use;
 - Site context and planning history;
- Suitability:
 - Site characteristics;
 - Environmental considerations;
 - Heritage considerations;
 - Community facilities and services;
 - Other key considerations (e.g. flood risk, agricultural land, tree preservation orders); and
- Availability

Step 3: Completing the site pro-formas

The site pro-formas were completed through a combination of desk top assessment and site visits.

Desk top assessment – this involved a review of the conclusions of the existing evidence and using other sources including google maps/streetview and MAGIC maps in order to judge whether a site is suitable for the use proposed.

Site visits - this allowed the team to consider aspects of the site assessment that could only be done visually. It was also an opportunity to gain an opportunity to better understand the context and nature of the Neighbourhood Plan area.

Step 4: Consolidating the results

Following the site visits, the desk top assessment was revisited to finalise the conclusions and compare the sites to judge which were the most suitable to meet the housing requirement. A 'traffic light' rating of all sites has been given based on whether the site is an appropriate candidate to be considered for allocation in the Neighbourhood Plan:

'Green' for sites that show no constraints and are appropriate as site allocations

'Amber' for sites which are potentially suitable if issues can be resolved

'Red' for sites which are not currently suitable.

The judgement on each site is based on the three 'tests' of whether a site is appropriate for allocation – i.e. the sites is suitable, available and viable.

The conclusions of the SHLAA were revisited to consider whether the conclusions would change as a result of the local criteria. It was decided that the local criteria, while useful for shortlisting sites for eventual selection, would not rule a site out as a potential allocation.

Shortlist of potential sites for development

Of all the circa 77 sites collated, many had already been assessed as unsuitable by St Albans, and so these were discarded. Sites that had never been subject to assessment were assessed, which led to some of these being graded as unsuitable.

A shortlist of the remaining sites potentially suitable for development was created and was subject to local consultation. All of the sites were located in the Green Belt. Some of these were later found to be unavailable, leaving a final list of six site locations, assessed as potentially suitable for development, subject to Green Belt release, where 1-5 would be for residential and 6 would be for care home.

- 1. Land at Orchard Drive;**
- 2. Land at Park Street Baptist Church between Tippendell Lane and Orchard Drive;**
- 3. Land south of Park Street Lane;**
- 4. Land to the rear of Bucknalls Lane;**
- 5. Land at Frogmore, off the A5183; and**
- 6. Land at Burston Nurseries.**

All of the sites were located within the Green Belt and during this period, the National Planning Policy Framework was updated to enable Neighbourhood Plans to change Green Belt boundaries, where: a strategic need had been identified to do so, where other sites for development were not possible and where the land in question was considered to no longer meet the requirements of the Green Belt.

Early discussions with SADC revealed support for amending Green Belt boundaries and allocating sites within the neighbourhood plan; it was confirmed that a strategic need would be identified for St Stephen as part of the emerging Local Plan process. At this stage, the Local Plan was anticipated for adoption in or prior to 2020 and in advance of the 'making' of the St Stephen Parish Neighbourhood Plan. The Local Plan site process did not drill down to small-scale sites, which were considered more suitable for allocation at the neighbourhood plan scale. In a Parish such as St Stephen, which is covered

by Green Belt beyond the settlement boundaries, the District Authority expressed support for small-scale amendments to the Green Belt boundary in accordance with the NPPF.

The Site Assessment Report can be found on the St Stephen Neighbourhood Plan website here: <https://www.ststephenparishcouncil.gov.uk/neighbourhood-plan/>

The justification for releasing / amending the Green Belt

St Stephen is highly constrained by environmental assets, such as the Green Belt, therefore the group undertook a Local Call for Sites to maximise the long-list of potential sites to consider. All of the sites put forward via the site assessment process and assessed as potentially suitable for development were within the Green Belt.

Given the lack of available sites in the settlement area, it was considered necessary to explore the possibility of Green Belt release to meet locally specific needs (a key objective for the Neighbourhood Plan). This approach was supported by the Local Authority.

It was important that any future development should be linked to one of the existing settlements in the Parish. This was considered a reasonable strategy, as most of the development opportunities offer easy access to the village centre and local shops, services and transport (main roads).

Alternatives to Green Belt release

The Local Authority supported the approach that limited Green Belt release was considered necessary to meet the overall housing strategy (in addition to strategic sites being dealt with through the emerging local plan) and that this would be established in the emerging Local Plan, anticipated for adoption in 2020. Therefore, in principle, the release in neighbourhood areas was established, subject to the adoption of the new Local Plan. As the Neighbourhood Plan was being developed in parallel to the new Local Plan, it was felt prudent to plan for this scenario.

To make detailed changes to the Green Belt boundary, it is necessary to demonstrate exceptional circumstances for doing so (as well as testing alternative locations for release). One alternative would be not to allocate any sites, and to rely upon existing commitments, windfall development and any site allocations made through the Local Plan process. However, a key objective of the Neighbourhood Plan is to influence the location and type of housing development that is secured in St Stephen that is needs-led.

Justifying the locations for Green Belt release

The settlements within St Stephen Parish are surrounded by Green Belt land, which makes the allocation of land for building difficult. It was decided to identify land for allocation in the expectation that St Albans City and District Council would establish the strategic need for the change of Green Belt boundaries in the Parish in the new Local Plan (being prepared in parallel and anticipated to be adopted in advance of the neighbourhood plan).

Given the importance that the Plan attaches to the local Green Belt, any change to the Green Belt boundary should not weaken the Green Belt, should be as minor as possible and should, of its nature, not detract from the integrity of the village.

In terms of whether any other harm to the Green Belt would be caused by the development, paragraph 134 of the Framework sets out what the five purposes of the Green Belt are, these being:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;

- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

There is no immediately available land inside the village footprints or around them large enough to be considered for a development of the scale needed (other than alternative Green Belt sites). The NP argues that this is an 'exceptional circumstance'.

It is considered that the proposed approach utilises land where there is a clear boundary, therefore the redrawn boundaries around the proposed sites would be considered no weaker than the present one.

Many of the sites would gain additional amenity value for new and existing residents of the area, by way of new and/or enhanced footpaths enabling access to the public rights of way network, local open spaces and community facilities. Equally some of the sites would enable the provision of new community facilities.

The sites are of sufficient size and characteristic to allow for the environmental features to be protected and enhanced (which reflects the objectives of the Neighbourhood Plan). In particular, there is potential to strengthen wildlife corridors and sound/air quality buffers along the edge of some of the main roads bounding many of the sites.

For the sites shortlisted, the following considerations were recorded in relation to their contribution to the Green Belt:

1. Land at Orchard Drive, Park Street



To check the unrestricted sprawl of large built-up areas: The site adjoins the residential area of Park Street to the east and is restricted to the west by the North Orbital Road, which acts as a barrier to uncontrolled growth.

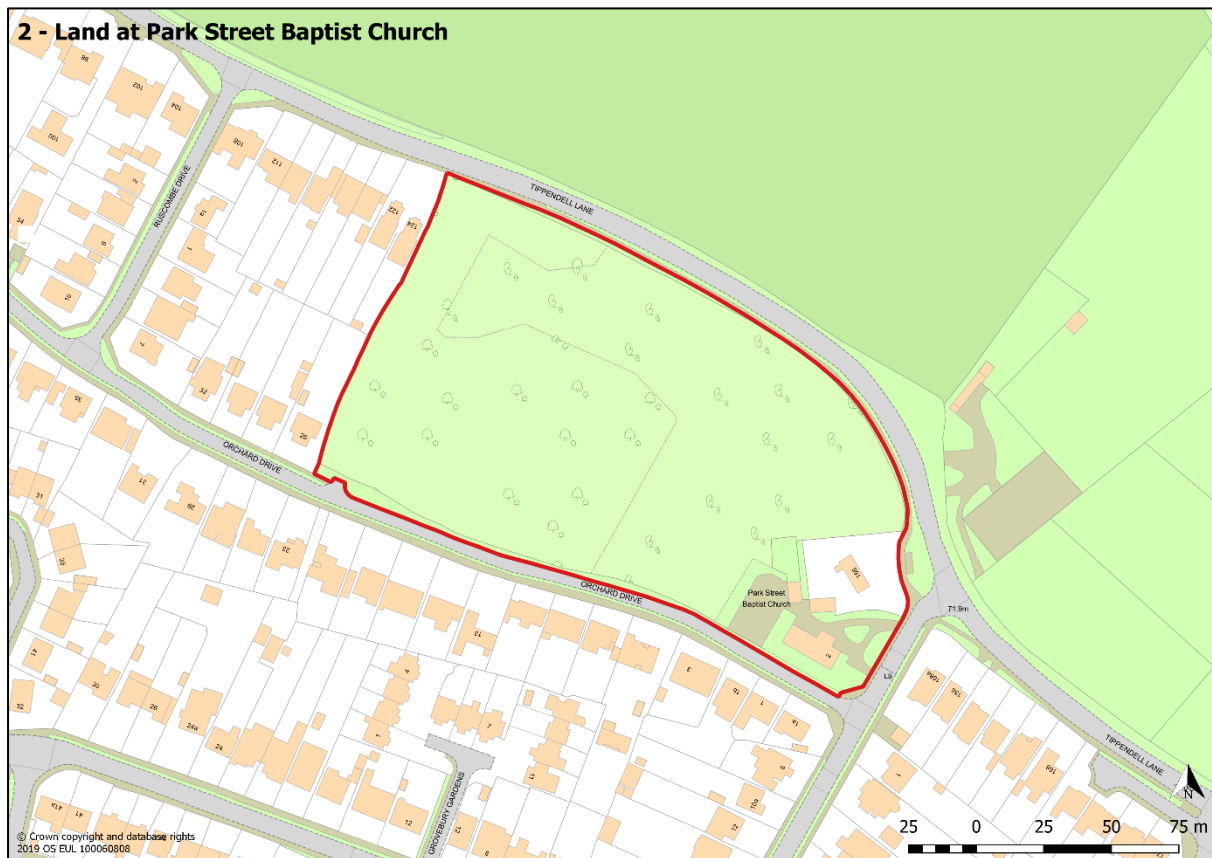
To prevent neighbouring towns merging into one another (coalescence): There would be no appreciable change to the existing degree of openness separating Chiswell Green to the west and Park Street to the East due to the intervening North Orbital Road and green buffer to the west of this road. The very west of the site could be planted to mitigate noise and maintain a sense of separation from the road and the settlement beyond.

To assist in safeguarding the countryside from encroachment: The site is a small pocket of Green Belt that is currently surrounded on all sides by development, therefore changing the Green Belt boundary would not be of detriment to the surrounding countryside.

To preserve the setting and special character of historic towns: The site is a pocket of currently unused green space within the Park Street community, surrounded by development on all sides. Its removal from the Green Belt and potential development could provide a high quality landscape realm which represents a visual and physical enhancement to the local area.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land
The site is currently unused and inaccessible. It is located opposite residential development and the southern end houses a playground and playing field. Development here could enhance the character of the immediate landscape.

2. Land at Park Street Baptist Church between Tippendell Lane and Orchard Drive



To check the unrestricted sprawl of large built-up areas: The site is bounded to the south, east and west by residential development and to the north by Tippendell Lane. This Lane forms a potential boundary, which would restrict further sprawl into the Green Belt beyond.

To prevent neighbouring towns merging into one another (coalescence): There would be no coalescence with neighbouring settlements.

To assist in safeguarding the countryside from encroachment: The site is bounded to the north by Tippendell Lane and therefore could be considered to be within the built limits of Park Street. The Green Belt beyond is much more open in nature, therefore amending the boundary of this site would not encroach on that sense of openness.

To preserve the setting and special character of historic towns: The site is currently unused and inaccessible, surrounded by trees. Its location within the road network is such that any development of the site could enhance the historic nature of the village, bringing it into residential and wider community use.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The site is low quality land and development could enhance the character of the immediate landscape. Beyond the settlements, the Parish falls wholly within Green Belt. There is an identified housing need for the Parish and no suitable sites not within Green Belt have been submitted.

3. Land south of Park Street Lane



To check the unrestricted sprawl of large built-up areas: The site is located in the south east corner of Park Street and amendment to the boundary would bring it in line with the development line to the west. The southern part of the site would remain open and planted to maintain the natural buffer to the M25 located to the south.

To prevent neighbouring towns merging into one another (coalescence): There would be no coalescence with neighbouring settlements.

To assist in safeguarding the countryside from encroachment: The site is surrounded to the north and west by residential development. The boundary to the east would remain, which leads to open countryside. To the south, the boundary is the M25. There is potential to enhance the southern part of the site to strengthen the residential development line and create a stronger boundary between developed area and open countryside.

To preserve the setting and special character of historic towns: Exclusion of the site from the Green Belt would not be detrimental to the setting of Park Street village. There is currently residential development to the west of the site, and the maintenance of a natural buffer on the southern part of the site could enhance the sense of place.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land: Beyond the settlements, the Parish falls wholly within Green Belt. There is an identified housing need for the Parish and no suitable sites not within Green Belt have been submitted.

4. Land at Bucknalls Drive



To check the unrestricted sprawl of large built-up areas: The site is located in the south east corner of Bricket Wood, with the natural boundary beyond formed by Bricket Wood Common.

To prevent neighbouring towns merging into one another (coalescence): There would be no coalescence with neighbouring settlements.

To assist in safeguarding the countryside from encroachment: The site is surrounded to the north and west by residential development. The boundaries to the south and east would remain, which leads to woodland and open countryside. To the south, the boundary is the M25. The site is in line with the current residential development and not considered open in nature.

To preserve the setting and special character of historic towns: Exclusion of the site from the Green Belt would not be detrimental to the setting of Bricket Wood village. There is currently residential development to the west of the site, and the maintenance of a natural buffer on the southern part of the site could enhance the sense of place as well as enhancing.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land: Beyond the settlements, the Parish falls wholly within Green Belt. There is an identified housing need for the Parish and no suitable sites not within Green Belt have been submitted.

5. Land at Frogmore, off the A5183



To check the unrestricted sprawl of large built-up areas: The site is already contained by surrounding development and its removal from the Green Belt and development would not lead to the unrestricted sprawl of large-built areas or the merging of one town into another.

To prevent neighbouring towns merging into one another (coalescence): Located within the settlement, removal of the site from the Green Belt would not impact adversely upon the setting or special character of the village or encroach on the countryside.

To assist in safeguarding the countryside from encroachment

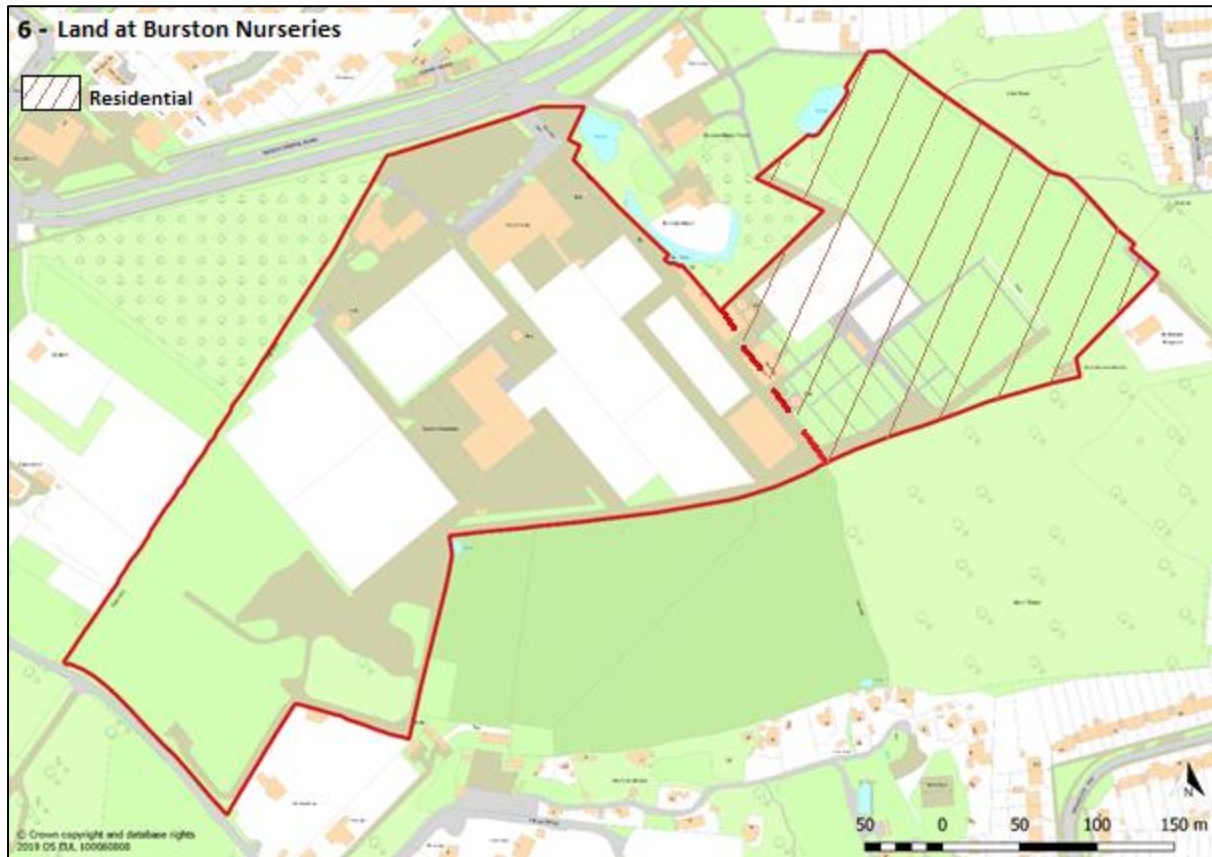
Located within the settlement, removal of the site from the Green Belt would not impact adversely upon the setting or special character of the village or encroach on the countryside.

To preserve the setting and special character of historic towns: The site is previously developed, low quality land, surrounded on all sides by development. It has the potential to enhance the immediate landscape, which would contribute to the local village character.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The site lies within an already established built-up context and is currently overgrown and redundant. Its redevelopment would therefore be consistent with, and of benefit to, the visual amenity and character of the area.

6. Land at Burston Nurseries



To check the unrestricted sprawl of large built-up areas: The site is already developed in part and therefore amending its boundaries would lead to no additional sprawl.

To prevent neighbouring towns merging into one another (coalescence): There would be no appreciable change to the existing degree of openness separating Chiswell Green and the North Orbital Road to the north and How Wood settlements to the south due to intervening woodland belts.

To assist in safeguarding the countryside from encroachment: The site is well encapsulated on all sides from woodland boundaries, the garden centre and the North Orbital Road. It is predicted that the development of this site will result in limited but not significant risk of encroachment on the local countryside and reduction in the degree of openness (much of the local countryside is degraded in quality comprising scrub, commercial land and disused workings).

To preserve the setting and special character of historic towns: The site represents a poor quality degraded landscape. The proposals have potential to provide a high quality landscape realm which represents a visual and physical enhancement.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land: The site is partly previously developed and is low quality land that is visually contained. Development could enhance the character of the immediate landscape.

Overall, while the proposed development of the site represents an increase in development footprint, any impact on the Green Belt will be localised and not result in significant sprawl, expansion or coalescence of adjacent settlements or encroachment into the countryside. The proposed development offers an opportunity for the positive re-use of derelict private land and re-enrichment of a degraded parcel of over-cultivated Green Belt offering little landscape, amenity or ecological value.