

APPENDIX 2



Feedback on St Albans Green Belt Review: Sites and Boundaries Study

Final Draft Report

February 2014

Minor amendments to the text for accuracy and to correct omissions etc are set out on the track changes version of report.

In addition to these, Dacorum would like to make some broader observations that relate to the conclusions reached by SKM and how these are taken forward. These are summarised below.

Methodology:

The Council does not wish to make any detailed comments regarding the methodology used for the Stage 2 study. However, we would reinforce the caveats included in SKM's report that:

- Green Belt releases need to be subject to detailed master planning, to ensure full consideration is given to issues such as layout, provision of supporting non-residential uses and linkages to existing services, facilities, road infrastructure etc. within Hemel Hempstead.
- Full account must be taken of issues not covered by the current study – these are summarised in para 1.3.3 of the report. The current report focuses primarily on environmental (landscape) considerations. Attention should also be given to social and economic considerations when making final decisions regarding the nature and scale of Green Belt releases. Officers may find it helpful to look at the '*Assessment of Potential Alternative Growth Scenarios for Hemel Hempstead*' (April 2009), prepared by DBC Officers, with input from SADC Officers and sustainability consultants C4S. It included detailed sieve mappings of locational options, and consideration of infrastructure and deliverability; geological considerations; transport and accessibility; economic development and regeneration potential; Green Belt and landscape character and conformity with established New Town Principles. This document is available on our website: <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/assessment-of-alternative-growth-locations-for-hemel-hempstead>.

Timing of development:

The conclusions in this revised report regarding the timing of development are preferable to the conclusions of the earlier draft report presented to your Members i.e. that Sites 1 and 2 should be within the 'third tier' ranking, rather than being suggested a 'safeguarded land' for development after the current plan period. The Borough Council would however welcome discussions with St Albans regarding the appropriate timing and phasing of development. The caveats in paras 12.1.6 – 12.1.7 are noted and supported.

Is there any confusion reached re the suggested timing / phasing of Site 2a) which is suggested for non-residential uses - a designation supported by Dacorum?

Scale of proposed releases at east Hemel Hempstead:

As you are aware, the NPPF puts great emphasis upon the long-term permanence of Green Belt boundaries. Para 83 says that *'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'* Para 85 goes on to list a series of criteria that local authorities should adhere to when defining boundaries. This includes the need to identify areas of 'safeguarded land' in order to meet longer term development needs *'stretching well beyond the plan period,'* and *'satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.'* Dacorum Council would welcome further discussion regarding the extent of the proposed Green Belt boundaries as part of the duty to co-operate.

Robustness of new Green Belt Boundaries:

The Council is concerned that new proposed Green Belt boundaries to both Sites 1 and 2(b) are not sufficiently robust. Whilst some justification is given in the text of the report, this doesn't appear to comply with the requirements of the NPPF to *'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

- Site 1 – proposed boundary follows relatively weak hedgerows and the set-back for overhead electricity transmission lines.
- Site 2(b) – boundary does not follow an existing physical feature but lies part-way across a field with no adjacent boundary. It is noted that woodland structure planting is proposed. This would require the early co-operation of landowners to ensure it was sufficiently established before development commenced to act as a screen. However, it does not exist at present and would not be a robust boundary at the time the site was taken out of the Green Belt through the Local Plan.

Site 2(a) follows logical existing boundaries i.e. the edge of Maylands and roads.

Size of new residential neighbourhoods:

SKM's report clearly recognises that the Green Belt release proposed would be new urban extensions to Hemel Hempstead and the need to comply with NPPF requirements relating to promoting patterns of sustainable development. This recognition is welcomed. Dacorum's concerns re this issue link back to observations under the methodology section above i.e. that final decision regarding the scale of any Green Belt releases in this location need to take full account of the capacity of existing infrastructure and 'tipping points' for the provision of new infrastructure. The current report only looks at the proximity to existing services and facilities, not their capacity to accommodate growth.

Hemel Hempstead was designed using the 'neighbourhood' concept, and the Green Belt releases proposed in Dacorum's Core Strategy seek to reinforce this. The following definition of is given in the glossary to the Core Strategy:

Typical New Town neighbourhoods have a population of about 2,500 people in about 1,000 dwellings. Key infrastructure needs include a primary school, local shop(s), community hall / cultural facility, access to health facilities and secondary schooling, public open space and other green infrastructure, new highways and links and access to passenger transport.

It is noted that the methodology used in SKM's report regarding dwelling capacities includes an assumption for land for supporting uses (page 125 – Task 2c). This is welcomed. However, we look forward to future close liaison with St Albans regarding site specific infrastructure requirements, how these link to existing infrastructure capacity within the town, and whether any of this existing infrastructure would reach a 'tipping point' where new facilities for the town would be required. An example previously raised by HCC when considering former RSS levels of growth for Hemel Hempstead was the potential need for a new secondary school to serve the town. Their preferred location for this was on Crown land to the east of Bunkers Park i.e. outside of the area illustrated as a potential Green Belt release.

As highlighted in the track changes document, SKM don't appear to have taken account of the gas pipeline that passes through Site 1 and 2. This will have a significant impact upon the dwelling potential of this area, due to restrictions on development over the line of the pipe and easements either side of it. This impact will be greatest for Site 1, as the pipelines runs through the middle of the site.