

Civic Centre Opportunity Site Supplementary Planning Document

Consultation Statement

This Consultation Statement sets out the consultation undertaken in the preparation of the Civic Centre Opportunity Site (CCOS) Supplementary Planning Document (SPD).

1. Pre-Consultation

In accordance with regulations a pre-consultation process was carried out in the preparation of the draft brief. Details of this are set out in Appendix 1, which was made available at during the six week consultation period in 2011.

2. Consultation on the Draft SPD

A six week public consultation on the draft brief was held between 1 November and 13 December 2011 in accordance with the Council's Adopted Statement of Community Involvement (SCI).

The Council notified the list of statutory and non-statutory consultees set out in appendices 1 and 2 of the SCI. Individuals and organisations registered on the Council's online consultation portal were also notified. An SPD Matters Statement was published for this consultation. This is set out in Appendix 2.

An advertisement was placed in local newspaper 'The Herts Advertiser' on 3 November 2011 stating where a copy of the documents could be obtained and when and where the documents could be inspected. Display boards on the brief were set out in the Alban Arena.

3. Post Consultation and Consideration of Responses

After the consultation period ended, a report containing an initial analysis of the consultation responses was taken to Planning Policy Advisory Panel (PPAP) on 25 January 2012. The report (attached as Appendix 3) set out an initial analysis of the consultation responses.

A further analysis was undertaken which summarised all the responses into themed subject areas. There was an associated officer comment for each subject area and recommended changes arising from the consultation responses, where the Council felt it could accommodate changes to the SPD.

This analysis was subsequently reported to Cabinet (21 June 2012), Local Service Scrutiny Committee (3 July 2012) and Council (11 July 2012) meetings. This analysis is set out in Appendix 4.

The CCOS Development Brief was adopted as an SPD at Council on 11 July 2012.

Appendix 1

Civic Centre Opportunity Site (CCOS) Planning Brief Draft Supplementary Planning Document (SPD)

Consultation Statement

In accordance with regulations a pre-consultation process has been carried out in the preparation of this draft document. This is summarised below:

The names of any persons / organisations consulted in connection with preparation of the draft SPD have included:

Individual Landowners and their representatives
St Albans Civic Society
St Albans & Hertfordshire Architectural & Archaeological Society
Religious Society of Friends (Quakers)
Internal St Albans City & District Council Service Providers
Council Executive Leader and Portfolio Holders
The Council's Planning Policy Advisory Panel

How those persons were consulted:

These have included by telephone; letter; email; personal meeting(s); attendance at committee meetings etc depending on degree of involvement and circumstances.

Summary of the Main Issues Raised:

These included:

- Landowners intentions and aspirations
- Existing rights of way and easements
- The nature and extent of proposed uses on site
- Service improvements of public providers
- The quality of urban design & architecture and the means of achievement
- Scale, height and massing of proposed buildings on redevelopment
- The implications of conservation area status on buildings and trees
- The level of future parking provision

How the Issues have been addressed in the SPD:

As with all planning proposals, the future development of this site will be resolved by balancing a number of different and often competing interests and aspirations. The draft SPD attempts to suggest how this can be achieved on this site whilst ensuring the type and scale of development which will be commercially successful and therefore ensuring that the attraction and appeal of the city centre is significantly enhanced.

A full public consultation is now being carried out in accordance with regulations and the Council's adopted Statement of Community Involvement

in relation to its emerging Local Development Framework. This is set out in the SPD Matters document supporting this consultation.

The SPD documents are available for inspection at the following locations:

- The Council Offices, St Peters Street, St Albans
- Harpenden Town Hall
- Public Libraries in the District

The documents are also available to view electronically on the Council website at

<http://www.stalbans.gov.uk/environment-and-planning/district-vision/>

Appendix 2

Town and Country Planning (Local Development) (England) Regulations 2004
[as amended]

SPD Matters and Statement of Fact Civic Centre Opportunity Site Planning Brief (CCOS) Draft Supplementary Planning Document (SPD)

The Council is consulting the public in relation to the CCOS Planning Brief SPD. The Council is keen to hear the views of local people and other interested parties on these proposals. This is an important opportunity to participate in shaping the future of the Civic Centre Opportunity Site which is located within the heart of St Albans City Centre.

The Planning Brief SPD seeks to encourage a high quality mixed-use development on the site which will improve the standard of modern architecture; urban design and public realm whilst respecting the historic character of the city.

The listed documents include the following:

- Civic Centre Opportunity Site Planning Brief Draft SPD
- Sustainability Appraisal
- Consultation Statement
- SPD Matters
- Supporting documents

The SPD documents are available for inspection at the following locations:

- The Council Offices, St Peters Street, St Albans, AL1 3JE
- Harpenden Town Hall, Leyton Road, Harpenden, AL5 2BR
- Public Libraries in the District (details of these libraries and their opening hours are available from the Council offices or at <http://www.hertsdirect.org/services/libraries/findlib/librarydistrict/librarystalbans/>)

The documents are also available to view electronically on the Council website at

<http://www.stalbans.gov.uk/environment-and-planning/district-vision/>

Comments and representations on the draft Planning Brief SPD should be made **no later than 5pm on 13 December 2011** by **the following means:**

1. Online at <http://stalbans-consult.limehouse.co.uk/portal>
2. Sent to the postal address below:
Head of Planning & Building Control
St Albans District Council
St Peter's Street,
St Albans,
Herts, AL1 3RD
Fao Jon Baldwin, District Vision Implementation Manager

3. E-mail to jonathan.baldwin@stalbans.gov.uk

A Public Exhibition of the consultation proposals will take place from 21st November – 5th December 2011 at the Alban Arena.

If you have any questions or comments on this consultation please contact:

Jon Baldwin, District Vision Implementation Manager on 01727 819569
or email jonathan.baldwin@stalbans.gov.uk

Appendix 3

ST ALBANS CITY AND DISTRICT COUNCIL

REPORT TO : Planning Policy Advisory Panel

DATE : 25 January 2012

REPORT TITLE : Civic Centre Opportunity Site: Consultation Update

WARDS : All

CONTACT OFFICER : Manpreet Kanda, Spatial Planning Officer
01727 866100 ext: 2736
Email: Manpreet.Kanda@stalbans.gov.uk

1. **Purpose Of Report**

- 1.1 To provide an update to the Civic Centre Opportunity Site Planning Brief Consultation response.

2. **Recommendations**

- 2.1 That consultation analysis is completed and reported to the March Planning Policy Advisory Panel Meeting.

3. **Background Information**

- 3.1 The Council prepared a consultation Planning Brief Civic Centre Opportunity Site (CCOS) to provide additional detail to the Saved Policy 116 Policy Area 2E of the St Albans District Local Plan Review 1994. The Planning Brief has been prepared as a Supplementary Planning Document (SPD) to facilitate the delivery of high quality development of CCOS.
- 3.2 The consultation document and questions can be viewed in web format at http://stalbans-consult.limehouse.co.uk/portal/planning_policy/ccos/ccos?pointId=1948576 .
- 3.3 The SPD was consulted on between the 1 November and 13 December 2011. A Public Exhibition of the consultation proposals was also on display at the Alban Arena between the 21 November and 5 December 2011 and in the Council offices reception area.

4. **Consultation Process and Initial Responses**

- 4.1 Officers are in the process of analysing 59 consultation responses received which include a number of lengthy and detailed letters from key stakeholders. A general list and number of respondents is provided below.

Consultee type	Number of responses	Electronic (email and web consultation)	Paper
Statutory Consultees	7	5	2
Local and National Stakeholders	5	3	2
Site Owners/Occupiers	4	2	2
Adjoining Occupiers/Owners	3	2	1
Commercial Interests	6	3	3
Cllr/MP	3	1	2
Individuals (including 7 paper questionnaire responses received from the Albans arena exhibition)	30	19	11
SADC Internal	1	1	0
Total	59	36	23

- 4.2 Of the 59 consultation responses received, 9 were received directly through the St Albans online consultation; a further 9 were manually entered from email and paper responses which responded in the consultation questionnaire format. The remaining 41 responses did not directly answer questions as a whole. A summary of these consultation responses is provided below, which provides a quick overview of the issues raised so far, however this analysis is not wholly representative of all the responses received.

Q1. Do you agree with the objectives of the Planning Brief?		
Yes: 10	No: 5	
13 comments		
<ul style="list-style-type: none">• Connectivity via lanes rather than corridors• No need for more shops and office space• Preserve Forrester House elevation and mosaic panel• Accessibility for walkers and cyclists is important• Transport and funding needs to be considered• Underground parking should be considered• Provision of new museum and arts centre should be prioritised• Opportunity to link heritage assets• More soft landscaping and new trees required		
Q2. Do you consider that the potential benefits arising from a comprehensive approach to the site development out weigh the possible dis-benefits such as a potentially lengthier process?		
Yes: 8	No: 2	Don't Know: 1

<p>9 comments</p> <ul style="list-style-type: none"> • Co-ordinated, comprehensive and coherent approach needed for whole area • Flexible approach needed with developers • Opportunity for town centre bus terminus
Q3. Do you agree with the proposed uses for the site?
<p>Yes: 8 No: 3 Don't Know: 1</p>
<p>10 comments</p> <ul style="list-style-type: none"> • No more shops needed • Needs more emphasis on youth entertainment e.g. cinema • Hotel needed (budget and boutique) • High sustainability standards • Level of retail should be tested • Uses should encourage night and day time footfall • Combine cultural venue with other uses e.g. new museum at centre of cultural hub with classrooms, lecture room, performance space (inside and outside) • Design should be subject to an architectural competition
Q4. Are there any opportunities and constraints on the site that are not identified in the brief?
<p>Yes: 5 No: 2 Don't Know: 1</p>
<p>5 comments</p> <ul style="list-style-type: none"> • Not enough detail provided to identify other opportunities and constraints • A designed "statement" landscape
Q5. Should the level of public car parking provision on CCOS be:
<p>Increased: 5 Decreased: 4 Kept about the same: 2</p>
<p>7 comments</p> <ul style="list-style-type: none"> • Park and ride is needed • Tram system should be included • Reduce council car parking • Free/cheap parking is essential for city centre revitalisation • Consider an underground carpark • Difficulty of parking and reaching car parks puts people off • Long term objective should be to replace private with public transport
Q6. What type of new public open space should be delivered as part of the brief?
<p>9 comments</p> <ul style="list-style-type: none"> • A place to sit down e.g. Roman garden • Coherent and high quality • A square bordered by a rose garden • Multifunctional space/flat area • Accessible • Safe • A designed "statement" landscape • Sensory Garden • Memorial to Francis Bacon

Q7. Do you agree that the proposed heights and massing of the buildings are appropriate?		
Yes: 5	No: 4	Don't Know: 3
6 comments <ul style="list-style-type: none"> • Difficult to envisage building heights • Nothing taller than existing buildings • Should not loom or bulk over St Peters street or dwarf historic buildings within the site • Be bold and create a new skyline 		
Q8. Do you think the brief sets out the appropriate balance between protection and conservation and, new development?		
Yes: 3	No: 5	Don't Know: 2
8 comments <ul style="list-style-type: none"> • Roman pavement under the Arena should be displayed • Is there a need to demolish? • How much needs to be demolished? • Alms Houses are important, rest is not • Balance is achieved • Conservation is a poor second 		
Q9. General Comments		
8 Comments <ul style="list-style-type: none"> • Consultation timing • Document format and language • Exhibition quality • 3D visualisation would be useful • Unnecessary at this economic point in time • Consider accommodation for car-less people to reduce traffic • Salisbury and Winchester suggested as good examples for development whilst retaining heritage of City 		

4.3 A range of Key Stakeholders responded to the consultation including Hertfordshire County Council, Highways Authority, Religious Society of Friends (Quakers), Royal Bank of Scotland, Her Majesty's Court and Tribunal Services and the Police Authority. The following issues have so far been identified in their responses.

- Building heights –not high enough, too high.
- SPD status - needs more attention to consistent wording
- Quaker Gardens – concern over through routes
- More should be done on accessibility issues – specific disabled parking provision, benches, gradients, widths etc should be written in
- The potential of parking provision at CCOS being used by parents dropping and picking children up from Alban City School should be considered.

5. **Next Steps**

- 5.1 Given the importance of the Civic Centre Opportunity Site it is imperative that all consultation responses are analysed in appropriate detail and that the Council identifies how it will respond to each issue. This will also involve further dialogue with key respondents. Officers will continue to complete the consultation analysis and report these back to your Panels meeting in March.
- 5.2 The consultation analysis will be in the form of summary schedule setting out the consultees, key issues raised and Officers recommended actions/amendments.
- 5.3 The CCOS planning brief will then be amended and presented to your Panel for agreement and Full Council for approval (A Full Council resolution is required for adoption of an SPD, under the Planning & Compulsory Purchase Act 2004).

6. **Conclusion**

- 6.1 The consultation summary at section 4 provides a quick overview of the issues raised so far however this analysis is not representative of all responses received. Therefore Officers will complete the consultation summaries as outlined in section 5 which will be reported back to your March meeting.

7. **Implications**

Issue	Yes/No	Reference
Vision and Corporate Priorities	✓	The report's is relevant to the Council's vision and priority 2 as set out in the Corporate Plan 2009 - 2012.
Policy	✓	The consultation feedback will inform the final SPD which will provide greater detail to existing Policy 116 of the District Local Plan Review and future Core Strategy Policy.
Financial	x	No immediate issues arising from the content or recommendation of this report
Impact on the community	x	No immediate issues arising from content or recommendation of this report.
Legal and Property	x	No immediate issues arising from the content or recommendation of this report
HR/Workforce	x	No immediate issues arising from the content or recommendation of this report
Risk Assessment	✓	See paragraphs 7.1 below

Environmental Sustainability	x	No immediate issues arising from the content or recommendation of this report
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- 7.1 The risk of not taking forward the recommendation is that the adoption of the CCOS Planning Brief SPD will be delayed.

8. **Further Information/Appendices**

- 8.1 There are no appendices to this report.

9. **Background Papers - Local Government (Access to Information) Act 1985**

<u>Bibliography</u>	<u>Custodian</u>	<u>File Location</u>
Civic Centre Opportunity Site Planning Brief Consultation Document, November 2011	Manpreet Singh Kanda 01727 866100 X2736	District Council Offices Civic Centre St Peters Street AL1 3JE
District Local Plan Review, November	“	

Appendix 4 CCOS Consultation Key Messages, Comments and Recommended Changes

Theme	Key Messages	Officer Comments	Recommended Changes
General	<ul style="list-style-type: none"> • Too much use of jargon • Consultation should not have been held in the busy run up to Christmas • Support for redevelopment of the currently unattractive site • More pictures should be used in the brief and some diagrams are too small 	<ul style="list-style-type: none"> • The document needs to occasionally use technical language to give clarity on specific issues regarding local and national planning policy and urban design terminology, as it will be used to shape future planning applications. However, text will be reviewed to ensure it is in plain English where possible and a glossary has been included • Comments on the consultation period are noted but it was not held over the Christmas period and finished on 11 December. • Support for the redevelopment is noted. • Agreed, more pictures are proposed in final document. • The City Vision is the high level document for St Albans. Planning Briefs will be drawn up for large city centre sites such as Drovers Way. The Look! St Albans project is currently looking at producing a design document for the City Centre. 	<ul style="list-style-type: none"> • Technical terms will only be used where required and suitable alternatives are not available • More appropriate example photographs of other developments will be used • Where appropriate the brief will include larger diagrams but not to detriment of image quality.
Access	<ul style="list-style-type: none"> • Brief should seek to improve access through the site • Concern over access from Victoria Street • Brief should address the needs of those with disabilities • Site access and servicing should be resolved 	<ul style="list-style-type: none"> • The brief seeks to greatly improve pedestrian access and permeability through the site. • Discussions are taking place with HCC regarding traffic management options in St Peters Street. • Redevelopment of the site will seek to improve access for those with mobility problems 	<ul style="list-style-type: none"> • Allow for flexibility in the brief to reflect future traffic management proposals. • Includes reference to access for people of all abilities. • Review information on servicing requirements in the brief, but brief will not be overly prescriptive

Theme	Key Messages	Officer Comments	Recommended Changes
	<ul style="list-style-type: none"> • New development should not worsen City Centre congestion 	<ul style="list-style-type: none"> • Advice on servicing arrangements is provided, however detailed service arrangements will be developed by the applicant in association with the LPA and HCC. • All planning applications will be subject to a transport assessment and Green Travel Plans which will require the developer to address how proposals should not worsen congestion 	<ul style="list-style-type: none"> • The Herts Design Guide will be referenced in the bibliography
Conservation	<ul style="list-style-type: none"> • Development should be sympathetic to the site's surroundings and concern over impact of block development on burial ground and listed buildings • Support for better integration for the burial ground • Concern over running a pathway through the burial ground • Justification needs to be provided for the site constraints and opportunities 	<ul style="list-style-type: none"> • The brief is clear that development should be sympathetic to the surroundings including listed buildings and the burial ground. The brief will state that the Burial Ground should remain a quiet and open area • There are no proposals to run a pedestrian route through the burial ground. A route will run alongside the burial ground to open it up and connect the centre of the site to Victoria Street. Any redevelopment must enhance the setting of the burial ground as it is currently unsatisfactory. • A constraints and opportunities table will be added to the brief justified by the contextual analysis. 	<ul style="list-style-type: none"> • The brief will state that the burial ground should remain a quiet and open area. • A constraints and opportunities table will be added to the brief.
Context	<ul style="list-style-type: none"> • More detail should be provided on context, opportunities and constraints 	<ul style="list-style-type: none"> • Comments are noted • A constraints and opportunities table will be added to the brief justified by the contextual analysis. 	<ul style="list-style-type: none"> • A constraints and opportunities table will be added to the brief. • Additional text on the surrounding context to be provided.
Ecology	<ul style="list-style-type: none"> • No net loss of greenery on site • Set out how trees will be protected 	<ul style="list-style-type: none"> • The brief will not be so prescriptive to identify which trees will be retained and which trees 	<ul style="list-style-type: none"> • No change proposed

Theme	Key Messages	Officer Comments	Recommended Changes
	<ul style="list-style-type: none"> • Need for guidance on the removal of trees from the site 	<p>will be removed as this is for applicants to make the case. New trees and landscaping will be sought from proposals.</p> <ul style="list-style-type: none"> • All existing trees are shown on the opportunities and constraints diagram 	
Form	<ul style="list-style-type: none"> • Opposition and support for tall buildings on site • Pastiche development is not supported • Block development is not in keeping with St Albans character • Development shown in figures 25 and 26 are not suitable • Need to address streetscape issues in Victoria Street 	<ul style="list-style-type: none"> • The text and images on building heights in the brief is not as clear as it could be. However, the brief will not explicitly set out mandatory heights at exact points of the site. Instead it will keep height parameters such as taller buildings will be more suitable at the south eastern quarter of the site due to topography. • The brief states that pastiche development would be a missed opportunity but that development should be sensitive to the surrounding context and city centre location • A block form of development, is a fundamental principle of good urban design, it is highly efficient in respect of land use and is in keeping with the centre of St Albans. • The comments regarding figure 26 are noted. Figure 25 showed an indicative layout only and did not set out what the proposed development would look like. However, it will be removed from the final brief as it contains inaccuracies. • The City Vision recognises that this section of Victoria Street is a gateway to the City Centre and this will be set out in the brief 	<ul style="list-style-type: none"> • Reword heights and massing section • Figures 25 and 26 will be deleted and more appropriate example photographs of other developments will be used • Include a short section on streetscape
Infrastructure	<ul style="list-style-type: none"> • Impact of new housing on schools 	<ul style="list-style-type: none"> • Education contributions will be sought from 	<ul style="list-style-type: none"> • Set out headings under which

Theme	Key Messages	Officer Comments	Recommended Changes
		residential development	developer contributions will be sought
Objectives	<ul style="list-style-type: none"> • Support the themes of the introduction • Support the objectives but the could be clearer 	<ul style="list-style-type: none"> • The support is noted but it is agreed that the objectives could be refined 	<ul style="list-style-type: none"> • Set out clearer objectives in the brief
Ownership	<ul style="list-style-type: none"> • Little justification for land assembly • Section on EU procurement is not justified 	<ul style="list-style-type: none"> • The document does not set out that land assembly is required. • Detail on EU procurement is required due to Council land ownership 	<ul style="list-style-type: none"> • No change proposed
Parking	<ul style="list-style-type: none"> • Support for both higher and lower levels of on site car parking. • Any new parking should include disabled spaces • Electric vehicle charging points should be required. 	<ul style="list-style-type: none"> • It is acknowledged that there are diverse opinions on the level of car parking in the City Centre. The level of parking required on site will be dependant on the nature and quantum of proposed uses. The brief needs to be relevant and flexible and will therefore not set out a level of parking required on site. • Disabled spaces will be required and reference will be made to electric vehicle charging points 	<ul style="list-style-type: none"> • Emphasise the accessibility of the site and reword for clarity the section on car parking. • Include desire for electric vehicle charging points
Phasing	<ul style="list-style-type: none"> • Need for comprehensive redevelopment of the site • CCSS should be allowed to developed ahead of CCNS if required • Support for piecemeal development 	<ul style="list-style-type: none"> • The aim of the brief is to encourage comprehensive site development but it is accepted that CCSS may come forward before the north section of the site. However, the development principles set out in the brief will apply across the site. • Piecemeal development of the site in small parcels will not be supported 	No change proposed
Policy	<ul style="list-style-type: none"> • Clarify the status of the brief • Refer to local plan policy 114 • Refer to the emerging NPPF 	<ul style="list-style-type: none"> • The brief states that it will have SPD status • Local Plan Policy 114 is referred to • The NPPF has now been finalised and 	<ul style="list-style-type: none"> • Clarify that the whole brief has SPD status • Refer to the NPPF in the Policy

Theme	Key Messages	Officer Comments	Recommended Changes
		relevant elements will be referred to in the Policy Context section	Context section
Sustainability	<ul style="list-style-type: none"> • Demolition is not sustainable and buildings on site should be reused. • The Civic Centre should not be demolished • CHP and district heating should not be a requirement • The section on sustainability lacks direction. Could have communal gardens for housing and use SUDS to enliven public realm. 	<ul style="list-style-type: none"> • As well as being energy inefficient Hertfordshire House and the Police Station detract from the appearance of St Albans and should be redeveloped. • Further work is currently being undertaken on the Council's accommodation requirements, which will inform the brief. Refurbishment is a possibility for the Civic Offices and the Alban Arena. • The SPD states that the use of CHP and District Heating should be investigated. • SUDS and the potential for rooftop gardens will be referred to and the sustainability section will be restructured. 	<ul style="list-style-type: none"> • SUDS and the potential for rooftop gardens will be referred to and the sustainability section will be restructured.
Uses – Residential	<ul style="list-style-type: none"> • The site is a sustainable location for residential properties. • A mix of housing types and tenures should be provided. • A care home or elderly housing could be provided on site 	<ul style="list-style-type: none"> • The support for residential properties is noted • A mix of unit types and tenures will be sought. However, taking the city centre location and development viability issues into account, apartments are likely to form the majority of dwellings on the site. Current policy of 35% affordable housing will be required on site. • A care home is not considered to be compatible with the proposed and existing city centre uses. However, Lifetime Homes standards are referred to in the document. 	<ul style="list-style-type: none"> • No changes required
Uses – Retail	<ul style="list-style-type: none"> • There is no demand for retail uses on site due to the rise of online shopping, current economic conditions and out of 	<ul style="list-style-type: none"> • Retail is likely to form part of a mix of uses on site. The need for additional retail floorspace in St Albans is set out in the 2010 Retail 	<ul style="list-style-type: none"> • No changes required

Theme	Key Messages	Officer Comments	Recommended Changes
	town shopping facilities <ul style="list-style-type: none"> • Opposition towards a department store • This is not a suitable location for retailing • More detail on quantum's of uses should be provided 	Capacity Study. This took account of the increase in online trading. This retail capacity will also be set out in the Strategic Local Plan. St Albans has one of the lowest retail vacancy rates in the UK. <ul style="list-style-type: none"> • The brief does not envisage large footplate stores on this site. • The NPPF states that town and city centres are the preferred location for additional retail facilities. • By setting out a detailed quantum of development the brief would become inflexible and unresponsive to changes in market conditions. 	
Uses – Other	<ul style="list-style-type: none"> • Support for cultural uses on site including theatre, museum and cinema • Civic uses should remain on site • Hotel use is supported • Questions over the viability and the need for new office accommodation • Site should include public toilets with facilities for the disabled 	<ul style="list-style-type: none"> • Further investigation is being undertaken on the future of Alban Arena, although it is not likely that greater certainty will be available in time for the brief's adoption. • Existing section 3.7 states that a museum is a potential use on site. Leisure uses will be referred to as they are appropriate in this accessible location • It is proposed that a Local Services Hub will remain on site. • Findings indicate that there would be demand for premium new office floorspace in St Albans. It is not likely to form a large part of a redevelopment unless for new Council office floorspace (if required). • Public toilet requirements are considered to detailed for the brief 	<ul style="list-style-type: none"> • Refer to leisure uses

Theme	Key Messages	Officer Comments	Recommended Changes
Viability	<ul style="list-style-type: none"> • Affordable housing levels will affect development viability • The brief should set out what level of S106 contributions will be sought 	<ul style="list-style-type: none"> • 35% remains the aspiration for affordable housing across the District but the Strategic Local Plan will require 40%. • Delivery section will set out the headings under which S106 obligations will be sought. It is not appropriate to set out in a planning brief the level of contribution required as this may change depending on the nature of development and SADC policies. 	<ul style="list-style-type: none"> • Set out clearly under what headings developer contributions will be sought.