Sustainability Appraisal (SA) of the St Albans Local Plan

Interim SA Report

July 2023

St Albans City & District Council

AECOM Delivering a better world

Quality information:

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1 Introduction

1.1 Background

1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging St Albans City and District Local Plan ("St Albans Local Plan") being prepared by St Albans City and District Council.

1.1.2 Once adopted, the Plan will set the strategy for growth and change for the District up to 2041, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.

1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.[1]

1.2 SA explained

1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.

1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of "the plan and reasonable alternatives". The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.2.3 More specifically, the SA Report must answer the following **three questions**:[2]

- What has Plan-making / SA involved up to this point?
  - including appraisal of 'reasonable alternatives'
- What are the SA findings at this stage?
  - i.e. in relation to the draft plan
- What are next steps?

1.3 This Interim SA Report

1.3.1 At this current stage of the plan-making process, the Council is consulting on a first draft version of the Local Plan under Regulation 18 of the Local Planning Regulations.

1.3.2 This Interim SA Report is therefore published with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.

Structure of this report

1.3.3 Despite this being an 'Interim' SA Report, as opposed to the formally required SA Report, it is nonetheless helpful to structure this report according to the **three questions** above. Each of the three questions is answered within a discrete 'part' of the report.

1.3.4 Before answering the first question there is a need to further set the scene by setting out the scope of the plan (Section 2) and the scope of the SA (Section 3).

Commenting on this report

1.3.5 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under 'next steps'.

[1] Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.
[2] See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2 The plan scope

2.1 Introduction

2.1.1 The aim here is to briefly introduce the: context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the 'plan scope').

2.2 Context to plan preparation

2.2.1 Once in place the Local Plan will be known as the St Albans Local Plan 2041, and will supersede the adopted local plan (1994), although some of the other existing components of the wider development plan will remain extant, including neighbourhood plans (see www.stalbans.gov.uk/current-local-plan).

2.2.2 Wider key context includes:

- Legislation, policy and guidance - the Government has signalled its intention to make significant changes to the English planning system and, in May 2022, published its Levelling Up and Regeneration Bill, followed by draft revisions to the National Planning Policy Framework (NPPF) in December 2022. Whilst acknowledging that these changes may have significant implications for plan making in the future, the Government has reiterated the importance of maintaining progress to get up to date local plans in place. The Local Plan is therefore based on the 2021 NPPF (but mindful of proposed changes), the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990. The new Local Plan must also be prepared having regard to Government's Planning Practice Guidance (PPG). A primary consideration, central to the NPPF (para 11) is a requirement to maintain an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.
- The Duty to Cooperate - the plan must be prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, there is a need to work closely with neighbouring local authorities (particularly within southwest Hertfordshire), Hertfordshire County Council, statutory advisory bodies (for example, the Environment Agency, Natural England, Historic England and National Highways), infrastructure provides and other key organisations (e.g. Herts Local Enterprise Partnership).
- Neighbourhood planning - the Local Plan must naturally take account of 'made' neighbourhood plans (Harpenden, Sandridge and St. Stephen) and those that are emerging (Redbourn and Wheathampstead have passed the referendum stage and are due to be 'made'). Also, plan areas have also been designated for Colney Heath and London Colney. Neighbourhood plans must be in general conformity with the Local Plan, but it is equally the case that neighbourhood plans inform local plan preparation.

2.3 The plan area

2.3.1 St Albans City and District lies within the south west of the county of Hertfordshire. To the west is Dacorum Borough, including Hemel Hempstead (which abuts St Albans District) and an extensive area designated as part of the Chilterns Area of Outstanding Natural Beauty (AONB; note that a boundary review is underway). To the south are the final three authorities that, together with St Albans and Dacorum, form the South West Herts sub-region, namely Watford Borough, Three Rivers District and Hertsmere Borough. These three authorities are closely associated with the northwest London suburbs.

2.3.2 The District also links closely with the North East and Central (NEC) Hertfordshire authorities to the east and northeast. In particular, St Albans itself links closely to Hatfield, which falls within Welwyn Hatfield Borough. There are also close links to Bedfordshire, in particular to Luton, which is closely linked to St Albans District via major north-south transport links, including the M1 and the Midland Mainline.

2.3.3 St Albans itself is the largest settlement and is located in the central southern part of the District. To the south of St Albans is London Colney and a cluster of closely linked smaller settlements, as well as a high density of transport infrastructure, including the M25. This is also the location of a Government permitted Strategic Rail Freight Interchange (SRFI; see www.stalbans.gov.uk/strategic-rail-freight-interchange) that is expected to be delivered in the plan period, alongside new strategic transport and green infrastructure.

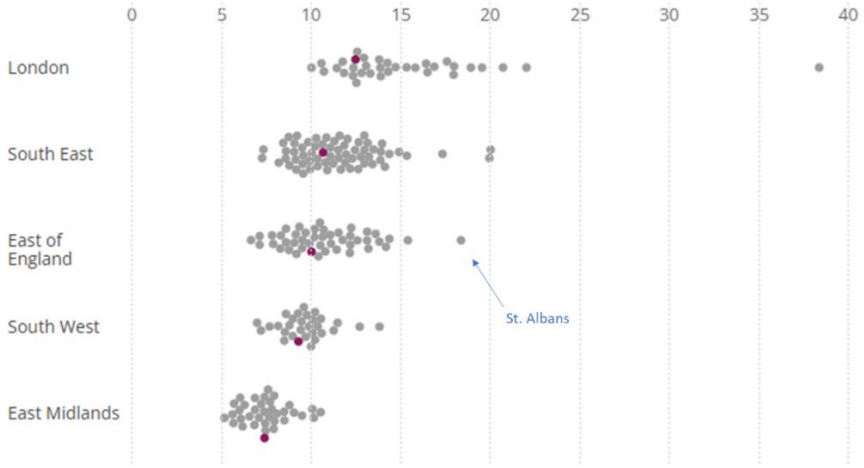
2.3.4 The part of the District to the north of St Albans is then more rural, associated with Harpenden and the villages of Redbourn and Wheathampstead. Finally, by way of orientation, there is a need to emphasise the close ties between the western extent of the District and Hemel Hempstead, to the west. The District boundary currently defines the eastern edge of Hemel Hempstead, but there are proposals for a major expansion into the District (broadly as far as the M1 but ensuring a greenspace buffer to Redbourn). This expansion into the District would form roughly one half of a wider programme of strategic expansion known as Hemel Garden Communities (HGC; see www.stalbans.gov.uk/hemel-garden-communities).

2.3.5 The entire District falls within the London Metropolitan Green Belt, which is an important designation and constraint to growth. There are a wide range of other important constraints to growth that must be taken into account as part of plan-making, but two potentially stand-out. Firstly, there is a high density of conservation areas (19 in total) and listed buildings (over 800) and St Albans itself is renowned for the Roman Town of Verulamium and St Albans Cathedral. Secondly, a 12.6km zone of influence surrounds Ashridge Woods and Commons Site of Special Scientific Interest (SSSI), in Dacorum Borough, within which there are strict restrictions / requirements placed on housing growth (discussed below). There is also a high-quality natural environment more widely (including the corridors of the three valued chalk streams/rivers) and infrastructure capacity is another constraint to growth locally.

2.3.6 The 2021 Census showed the population of the District to be 148,200, an increase of approximately 6% since 2011. In common with the national picture, the population of the District is ageing, but there is a comparatively good mix of ages given that the District has long been a popular location from which to commute to London, given good access to employment locally and also given popular schools. In terms of ethnicity the majority of the population is White British, with Asian/ Asian British as the second largest category at 8% and Black/ Black British around 2%.

2.3.7 Overall the District is very affluent, ranking as the 12th least deprived local authority nationally (out of 317) according to the Index of Multiple Deprivation (2019). There are above average levels of highly qualified professionals and residents have high average salaries. However, house prices are so high – averaging £619,567 – that housing is unaffordable for many, let alone for those who are less affluent or experience relative deprivation. The Office for National Statistics (ONS) housing affordability ratio (which reports the ratio of median house prices to median workplace-based earnings) shows St Albans to be a major outlier – see Figure 2.1. There are alternative ratios that are lower, notably ratios that account for residence-based earnings, but the fact remains that housing affordability is a major issue locally.

Figure 2.1: *Housing affordability for select regions, with average authorities highlighted*



2.3.8 The plan area is introduced across two maps below:

- Figure 2.2 – is taken from the Green Belt Review (2023) and highlights the distinction between towns (Hemel Hempstead, St Albans and Harpenden), other settlements inset from the Green Belt and villages / small settlements that are washed over by the Green Belt. It can also be seen that there is built form to the southeast of St Albans and to the west of London Colney that is washed over by the Green Belt. The possibility of insetting currently washed-over areas of built form is a consideration for local plans.
- Figure 2.3 – shows St Albans in the wider sub-regional context. St Albans is formally part of the South West Herts sub-region, but also relates closely to Luton (to the north, within Bedfordshire) and Hatfield to the east (within Welwyn Hatfield Borough, which is formally part of North, East and Central Herts).

Figure 2.2: *A map of the plan area (taken from the Green Belt Review, 2023)*

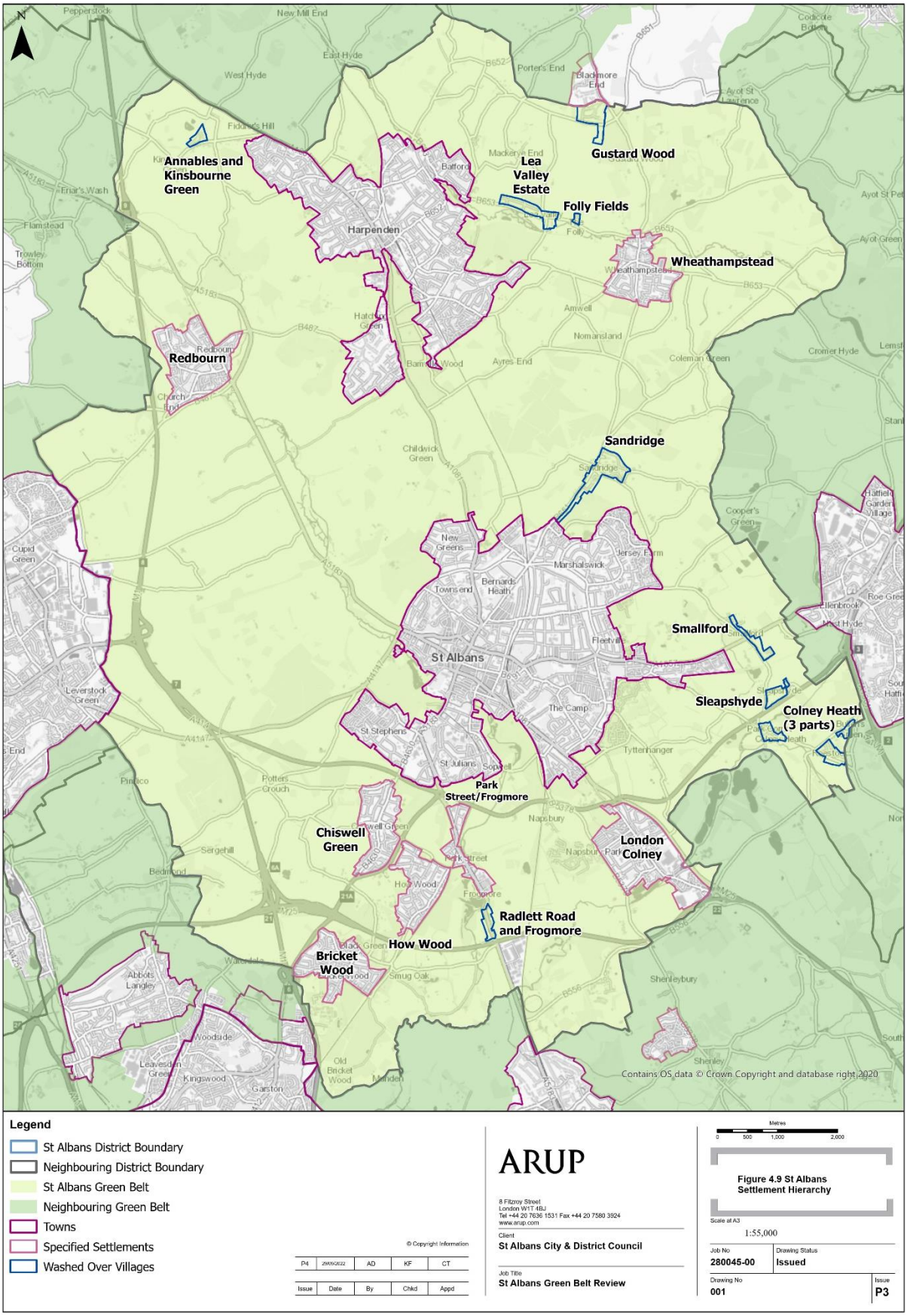
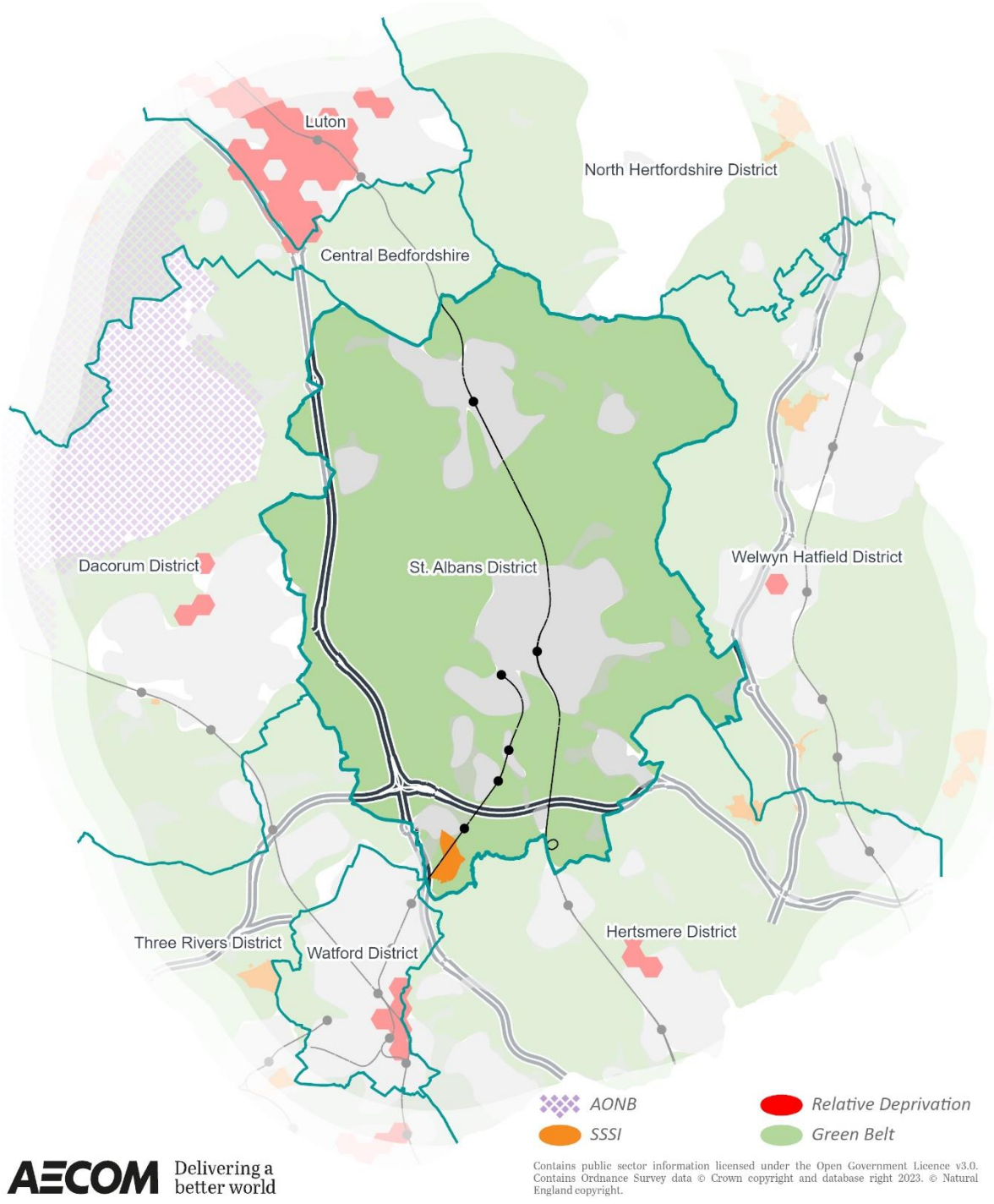


Figure 2.3: *The plan area in the sub-regional context*



2.4 The plan period

2.4.1 The new Local Plan is likely to be adopted in 2025/26, and must "*look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure...*" As such, the plan period runs to 2041.

2.4.2 In turn, a key aim is to provide for development needs to 2041; however, there is some flexibility, with the NPPF requirement to identify *"specific, deliverable sites for years one to five…"* and *"specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15…"*

2.4.3 Additionally, there is a need to be mindful of NPPF paragraph 22, which states: *"Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead..."*

2.5 Plan objectives

2.5.1 A number of key issues locally are introduced above, but there are wide ranging other key issues for the Local Plan. Many key issues for the Local Plan derive from the NPPF which, for example, requires that local plans provide *"a framework for addressing housing needs and other economic, social and environmental priorities."* One arguably overriding key issue is climate change, with the Council having declared a Climate Emergency in 2019 and the urgency of the issue having crystallised since that time.

2.5.2 Understanding of key local and larger-than-local key issues has been translated by the Council into a succinct set of objectives to guide preparation of the Local Plan – see Table 2.1.

Table 2.1: *The plan objectives*

Broad focus	Specific focus	Objective
Climate change and spatial strategy	Climate change	Promote adaptation and mitigation to the Climate Change Emergency; seek to achieve net zero by 2030, including through the Council doing everything reasonably within its power; promote the use of renewable resources, reduce carbon emissions, protect natural resources and reduce waste.
	Use of land / Green Belt	Prioritise the effective use of land by locating new development on previously developed land first, where appropriate; and protecting and enhancing the Green Belt.
Housing	Housing	Provide a sufficient amount of good quality housing which meets the needs of all sections of society in sustainable locations.
Infrastructure	Community infrastructure	Make sufficient provision for and access to community infrastructure in sustainable locations.
	Transport	Encourage the use of active and sustainable means of transport and reduce the need for people to travel
	Utilities infrastructure	Ensure essential utilities infrastructure, inc. broadband, is delivered to support our existing residents and services as well as growth.
Economy and employment	Economy and employment	Encourage strong and resilient economic growth, employment and skills opportunities; including supporting growth in green and creative sectors; and supporting new ways of working across the District.
	Town and village centres and retail	Support the role that the town, village and neighbourhood centres play at the heart of local communities, sustainable lifestyles and the visitor economy, by taking a positive approach to their growth, management and adaptation.
Natural and historic environment	Natural env and biodiversity	Protect, maintain and enhance the natural environment, including biodiversity, the landscape, green infrastructure and our waterways.
	Heritage	Conserve and enhance our rich and varied historic assets and their settings, celebrating their local distinctiveness and character.
Healthy places and high-quality design	High quality design	Achieve high quality, innovative, well designed and locally distinctive developments in existing and new places.
	Public health and wellbeing	Promote active, healthy and sustainable communities and a high quality of life.

3 The SA scope

3.1 Introduction

3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).

3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in **Appendix II**, as well as within a Scoping Report (2021), although that report is now somewhat out-of-date.

3.1.3 The aim is not to define the scope of the SA comprehensively, recognising that there is a need for flexibility to respond to the nature of the emerging plan and reasonable alternatives, and latest evidence.

3.2 Consultation on the scope

3.2.1 The Strategic Environmental Assessment (SEA) Regulations 2004 require that: *"When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies."* In England, the consultation bodies are the Environment Agency, Historic England and Natural England.[3] As such, these authorities were consulted on the SA scope in 2021, plus the Council took the additional step of also consulting more widely (simultaneously also seeking views on a new Local Development Scheme and a Call for Sites).

3.2.2 A total of 16 consultation responses were received; see: www.stalbans.gov.uk/sustainability-appraisal. Further information is presented in Appendix II; however, in summary:

- Statutory consultees and other organisations with a strategic remit – a detailed response was received from the Environment Agency, and a more generic response received from Historic England (including a focus on 'generation of reasonable alternatives; see discussion in Part 1). Natural England did not submit a response. Herts and Middlesex Wildlife Trust submitted a brief response, whilst both Thames Water and National Highways responded to the consultation but did not comment on SA scoping.
- Neighbouring authorities – did not respond, nor did the County Council.
- Town and Parish Councils – a detailed response was received from Sandridge Parish Council, and less detailed responses were received from Harpenden Town Council and London Colney Parish Council.
- Site promoters – a total of seven submitted a response. Several made comments on scoping the 'housing' related issues/objectives that should be a focus of the appraisal, e.g. seeking added consideration of housing affordability ratios, affordable housing need and rural housing need; and another focus was the scope of the SA in terms of community infrastructure issues/objectives. Three of the responses did not focus on the SA scope, but rather discussed expectations in respect of subsequent stages of the plan-making SA process, particularly consideration of reasonable alternatives (see Part 1).

3.2.3 Comments on the SA scope are welcome at the current time.

3.3 The SA framework

3.3.1 The scoping work presented within the Scoping Report (2021) led to a draft SA framework, comprising 16 objectives grouped under ten topic headings. In light of the consultation responses received in 2021, as well as discussions between AECOM and SADC officers (informed by latest evidence and understanding of the scope of the emerging plan), the decision was taken to make some modest adjustments to the objectives – see discussion in Appendix II. Also, the decision was made to group the objectives under 13 topic headings and to present the framework in alphabetical order according to the topic headings.

3.3.2 The updated SA framework is presented below.

[3] In-line with Article 6(3) of the SEA Directive, these bodies were selected because *"by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes."*

Figure 3.1: *The SA framework*

Topic	Objective(s)
Accessibility	• Support access to community infrastructure – both strategic (e.g. secondary schools) and local (e.g. primary schools) – for all sections of society, including mindful of 15 minute city / 20 minute neighbourhood principles.
Air and wider env quality	• Achieve good air quality across the District and more widely, including with a particular focus on improving air quality in current known hotspots, notably air quality management areas.
Biodiversity	• Protect, maintain and enhance biodiversity in the District and more widely, supporting effective implementation of the biodiversity net gain regime and taking a landscape scale perspective (mindful of the forthcoming Local Nature Recovery Strategy).
Climate change adaptation	• Reduce the risk of flooding accounting for climate change scenarios and with a focus on risk affecting both new and existing communities. • Ensure climate change adaptation / resilience more widely, recognising that this is a cross-cutting topic, e.g. with links to biodiversity, communities / health and the water environment.
Climate change mitigation	• Ensure all steps are taken in support of climate change mitigation, with a focus on per capita emissions, but also mindful of District-wide total emissions and associated targets. • Reduce greenhouse gas emissions (with a particular focus on per capita) from both the built environment (a focus here) and transport (also a separate focus of discussion below).
Communities and health	• Support active and healthy communities, including via access to open spaces, high quality green and blue infrastructure, active travel infrastructure and sports and recreation facilities.
Economy and employment	• Achieve a strong and resilient economy across the District (and more widely), including by providing for employment land needs and supporting St Albans city centre and other centres with a strategic response to national trends.
Historic environment	• Preserve and enhance heritage assets and their settings and consider the historic environment more widely, including links to landscape, character and sense of place.
Housing	• Provide a wide range of good quality housing (in terms of type, tenure and location) which meets headline housing need as far as possible and accounts for the specific needs of all sections of society.
Landscape	• Maintain and enhance the quality of the countryside and landscape, particularly those that are known to be highly valued, e.g. those that are highly visible, accessible or contribute strongly to wider character and sense of place.
Soils and other resources	• Prioritise locating new development on previously developed land first. • Minimise development on best and most versatile agricultural land and minimise the degradation/loss of soils, particularly soils known to be of higher quality. • Promote efficient use of natural resources, account for the Hertfordshire Minerals and Waste Plan and protect material assets and geodiversity.
Transport	• Encourage the use of active and other 'sustainable' means of transport and reduce the need for people to travel.
Water	• Conserve and enhance water quality and flow and reduce the risk of water pollution, including by taking careful account of any capacity issues at wastewater treatment works.

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

4.1.1 Work on the current draft Local Plan began in 2020, when a previous version of the St Albans Local Plan was withdrawn (see https://www.stalbans.gov.uk/withdrawal-draft-local-plan-2018). A range of work has been undertaken to date, but there have not been any formal consultations prior to the current stage.

4.1.2 The focus here, within Part 1, is not to relay the entire 'story' of the plan-making/SA process, nor to provide a comprehensive 'audit trail' of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current consultation. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Section 5**
- present an appraisal of the reasonable alternatives - see **Section 6**
- explain the Council's reasons for selecting the preferred option - see **Section 7**

4.1.3 Presenting this information is in accordance with the requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

Reasonable alternatives in relation to what?

4.1.4 The legal requirement is to examine reasonable alternatives (RAs) taking account of "the objectives and geographical scope of the plan" (see Section 2). Following discussion of plan objectives with SADC officers, it was determined appropriate to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly a key objective of the Local Plan.[4] As such, it is reasonable to focus on exploring alternatives so as to inform a decision on the preferred spatial strategy.

4.1.5 The decision was made to refer to the spatial strategy alternatives as "**growth scenarios**".

What about site options?

4.1.6 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the St Albans Local Plan. Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.

Is the focus on housing sites?

4.1.7 Establishing a supply of land to meet housing needs (alongside infrastructure delivery, place-making etc) is typically a matter of overriding importance for local plans, and the St Albans Local Plan is no exception. However, local plans are also tasked with meeting wider development needs, including in respect of employment land and specialist accommodation. The process set out in Section 5 is somewhat *housing-led*, but other needs are discussed as appropriate, including within the concluding section (Section 5.5).

What about other aspects of the plan?

4.1.8 As well as establishing a spatial strategy, allocating sites etc, the Local Plan must also establish policy on thematic district-wide issues, as well as site-specific policies. Broadly speaking, these can be described as development management (DM) policies. However, it is a challenge to define "reasonable" DM policy alternatives.[4,5] In this case, following discussions between SADC officers and AECOM, no reasonable DM policy alternatives were identified, but views are welcomed through the current consultation.

[4] It was also considered appropriate to focus on 'spatial strategy' given the potential to define "do something" alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. The Government's Planning Practice Guidance (PPG) is clear that SA "*should only focus on what is needed to assess the likely significant effects of the plan*".

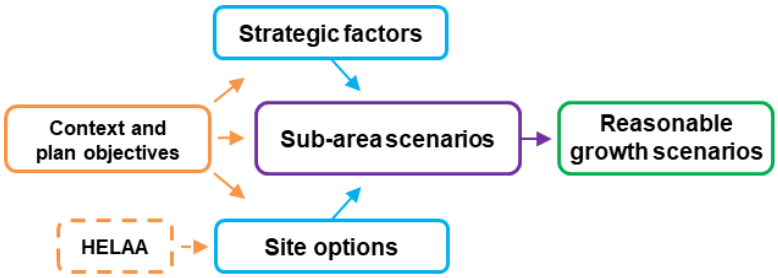
[5] It is important to recall that "do nothing" is the baseline situation, and so arguably not a reasonable alternative to "do something", recognising that the very aim of appraising any "do something" option is to appraise that option against the baseline. Arguments for "do nothing" not being 'reasonable' are particularly clear where the plan objective is to "do something".

5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: *Establishing reasonable growth scenarios*



Structure of this section

5.1.2 This section of the report is structured as follows:

- **Section 5.2** – explores **strategic issues** and options with a bearing on growth scenarios.
- **Section 5.3** – considers individual **site options**, as a key input to growth scenarios.
- **Section 5.4** – explores growth scenarios for **sub-areas**.
- **Section 5.5** – draws upon the preceding sections to define **reasonable growth scenarios**.

A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an *"**outline** of the reasons for selecting alternatives…"* [emphasis added].

5.2 Strategic factors

Introduction

5.2.1 The aim of this section of the report is to explore strategic issues and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes are needed (regardless of capacity to provide them)?
- Distribution – *broadly* where is more / less suited to growth and what types of growth are supported?

Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the District, before exploring arguments for the Local Plan providing for a quantum of growth either above or below LHN.

Background

5.2.3 A central tenet of the plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains:

*"Assessing housing need is **the first step** in the process of deciding how many homes need to be planned for. It should be undertaken separately from… establishing a housing requirement figure and preparing policies to address this such as site allocations."*

5.2.4 With regards to (A), the NPPF (paragraph 61) is clear that establishment of **LHN** should be informed by an *"assessment conducted using the standard method… unless exceptional circumstances justify an alternative approach which also reflects… demographic trends and market signals"* [emphasis added].

5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting the housing **requirement** *at* LHN and identifying a **supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a 'buffer' to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that *departs* from LHN.

5.2.6 Box 5.1 discusses the latest national context, in light of the Draft NPPF (December 2022).

Box 5.1: *A note on the national context in respect of LHN and setting the housing requirement*

The starting point is the National Planning Policy Framework (NPPF, 2021). Whilst the Government consulted on proposed changes to the NPPF between December 2022 and March 2023, the outcomes of that consultation cannot be foreseen, and it is unclear when the NPPF will be updated.

Regardless of whether account is taken of the Draft NPPF (2022), a central tenet of plan-making involves:

A) establishing local housing need (LHN); and then

B) developing a policy response to those needs.

This is explained most clearly within the Housing and Economic Needs Assessment (HENA) section of the Planning Practice Guidance (PPG), which explains:

"Assessing housing need is ***the first step in the process*** *of deciding how many homes need to be planned for. It should be undertaken separately from… establishing a housing requirement figure and preparing policies to address this such as site allocations." [emphasis added]*

The **NPPF (2021)** is less clear on this matter. However, paragraph 11 discusses the potential to set the housing requirement at a figure below LHN, whilst paragraph 35 discusses the need to consider a housing requirement at a figure above LHN when there is an unmet need from neighbouring authority. The HENA section of the PPG also discusses factors influencing a final decision on the growth quantum / the housing requirement.

With regards to the **Draft NPPF (2022)**, there are several points to note:

- Firstly, an addition to paragraph 61 states that understanding of LHN is an *"advisory starting-point for establishing a housing requirement for the area."* This is considered to be simply a clarification.
- Secondly, an addition to paragraph 66 states that: *"The 'housing] requirement may be higher than [LHN] if it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment."* Again, this is considered to be simply a clarification of the existing situation.
- Thirdly, several proposed changes are potentially supportive of a 'below LHN' housing requirement:
  - Paragraph 11 – new additional text serves to suggest that avoiding adverse effects to urban character is a factor that might influence a decision to set the housing requirement below LHN.
  - Paragraph 140 – new statement: *"Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting [LHN]".* This statement is not entirely clear but does appear to give additional weight to Green Belt as a constraint that might influence the housing requirement.

    This was preceded by the following statement made by the Secretary of Statement for Levelling Up Homes and Communities on 5th December: *"Green Belt protections will be strengthened, with new guidance setting out that local authorities are not required to review Green Belt to deliver homes."*
  - Paragraph 35 – amended to say local plans should *"meet the area's [LHN] so far as possible, taking into account the policies in this Framework"*. Additionally, reference to providing for unmet needs is deleted. This is arguably supportive of a 'below LHN' housing requirement and/or not providing for unmet needs.

In **summary**, the Draft NPPF (2022) does appear to increase the potential to argue for lower growth, whether in the form of a housing requirement below LHN or that does not provide for unmet needs from elsewhere.

However, the significance of the proposed changes is not entirely clear and should not be overstated. Also, and in any case, the proposed changes in the Draft NPPF may not be taken forward in full or at all.

It should be noted that a House of Commons Committee recently published a report on "Reforms to national planning policy, for example stating: *"The Government has not provided sufficient evidence to demonstrate how the policy of removing mandatory local housing targets will directly lead to more housebuilding."*

St Albans' Local Housing Need (LHN)

5.2.7 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (the 'cities uplift', which does not apply to St Albans).[6]

5.2.8 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method, since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections (with reasons set out clearly at paragraph 5 of the PPG on housing needs assessment). Updates to the PPG in late 2020 confirmed this approach and this approach was also reconfirmed in December 2022.

5.2.9 The standard method derived LHN for the District is currently **888 dwellings per annum** (dpa), or 15,096 homes in total over the plan period. This is a 'capped' figure, meaning that Step 3 of the standard method ("Capping the level of any increase") applies. The uncapped figure is 1,165 dpa, and it should be noted that the PPG states: "*Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered."*

5.2.10 With regard to Step 2 ("An adjustment to take account of affordability"), housing affordability has worsened in St Albans over the past four years, leading to an increased standard method-derived LHN. The latest ratio of median workplace earning to median house price is 18.4% (up from 17.6%), which is significantly higher than all nearby local authorities, and very high in the context of the wider region. However, as discussed above, it should be noted that residence-based affordability ratios are lower.

Is it reasonable to explore setting the housing requirement at a figure below LHN?

5.2.11 As currently drafted (without considering the current proposed changes), Paragraph 11 of the NPPF states: *"… strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."* [emphasis added]

5.2.12 St Albans District is heavily constrained by NPPF *"policies… that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area"*. In particular, the District falls within the London Metropolitan Green Belt. Also, biodiversity and historic environment designations are a constraint to growth in some parts of the District.

5.2.13 At this point, it is also important to recall proposed additions to the NPPF (December 2022) - see Box 5.1.

5.2.14 On the basis of the points discussed above, there is a clear strategic argument for exploring growth scenarios that would involve setting the housing requirement at a figure below LHN and, in turn, generating unmet housing needs that must then be met by one or more neighbouring or nearby local authorities.

5.2.15 However, on the other hand, there is a strong argument for ruling out "very low growth". This reflects:

- The extent of housing need locally, including need for affordable housing, which is very high.
- Understanding that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, for example in terms of supporting communities, health and wellbeing, strategic infrastructure delivery and the local economy.[7]
- The fact that St Albans sits within a constrained sub-region where unmet housing need is already an issue, with the reality being that there is little or no confidence regarding where, when or even if any unmet housing need generated by the St Albans Local Plan would be provided for. Neighbouring local authorities have objected to past versions of the St Albans Local Plan (i.e. versions that ultimately failed and were not progressed) on the basis of proposals to generate unmet housing need.

[6] See gov.uk/guidance/housing-and-economic-development-needs-assessments.
[7] This is an important considering including in light of the following proposed addition to paragraph 140 of the NPPF (December 2022): *"Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period."* This could be read as suggesting that, in order to build a case for reviewing Green Belt boundaries through a local plan, there is a need to take into account factors other than housing need.

Is it reasonable to explore setting the housing requirement at a figure above LHN?

5.2.16 There are three reasons for considering the possibility of setting the housing requirement above LHN:

- **Local housing need** – as discussed above, the 'uncapped' LHN figure for St Albans is significantly higher than the figure derived from the standard method (which involves applying a cap).
- **Affordable housing need** – is also very high locally, and PPG states: *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."* Specifically, the South West Herts Local Housing Needs Assessment (LHNA, 2020) identifies a need for 443 affordable homes to rent per annum plus a need for 385 per annum affordable home ownership. The combined figure is very high in comparison to LHN, mindful that market-housing led schemes typically deliver affordable housing at a rate of up to ~40%.

  Furthermore, there is also a need to consider the recent rates of affordable housing delivery, as understood from the past five Authority Monitoring Reports (AMRs), which is 19.4%, with a breakdown by tenure as follows: social rent – 23%; affordable rent – 57%; affordable ownership – 21%. It is not clear that this fully aligns with the LHNA recommendation that "*[s]uch is the scale of affordable housing need… [the plan] should seek to deliver as much affordable housing to rent as viability allows*.

  Having said this, it is not realistic to consider very high growth scenarios with a view to meeting affordable housing needs, as need/demand for market housing becomes a limiting factor on housing delivery.
- **Unmet housing need for elsewhere** – the NPPF is clear that (emphasis added]: *"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need **(and any needs that cannot be met within neighbouring areas)** can be met over the plan period."* [emphasis added]

  The "positively prepared" test of soundness is also clear that local plan housing requirements should be *"informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.* However, there are significant draft proposed changes (December 2022; see Box 5.1) that potentially have the effect of reducing the emphasis, within the NPPF as a whole, on providing for unmet need.

  Unmet housing need is an issue within the sub-region. However, the emerging South West Herts Joint Strategic Plan is clearly well-placed to deal with unmet housing need (whether from within SW Herts or from elsewhere). **Box 5.2** presents further discussion.

5.2.17 Finally, there is a need to briefly note paragraph 10 of the PPG on housing needs assessment, which sets out wider reasons for exploring 'above LHN' options, as well as the Draft NPPF, which proposes the following addition to paragraph 66: *"The 'housing] requirement may be higher than [LHN] if it includes provision for neighbouring areas **or reflects growth ambitions linked to economic development or infrastructure investment**."* [Emphasis added].

5.2.18 However, such arguments do not apply strongly to St Albans. There is an economic growth opportunity, including mindful of high rates of out-commuting, but the LHNA is clear that there is no economic growth case for setting the housing requirement above LHN.

The historic environment is an important constraint to growth within parts of the District

***Box 5.2:** Discussion of unmet housing need*

The SW Herts Joint Strategic Plan (JSP) will likely prove well-placed to deal with unmet housing need. However, that does not mean that the St Albans Local Plan can be prepared blind to known or potential unmet housing need from elsewhere, particularly that arising from adjacent or otherwise well-linked neighbouring authorities.

This is for two reasons. Firstly, there is a risk of the SW Herts JSP facing unforeseen issues, given that the JSP is being prepared voluntarily (and noting recent examples of JSPs elsewhere failing). Secondly, addressing unmet housing need as close to source as possible, and in a timely fashion, is a key issue for any local plan.

Unmet need risk typically emanates outwards from London, and the current situation for the St Albans Local Plan is no exception. However, in the case of St Albans District, there is also a need to consider risk of unmet need emanating from the west (Dacorum Borough) and from the east (Welwyn Hatfield Borough).

With regards to neighbouring authorities to the north, there is potential for unmet need, but there is little reason to suggest that St Albans District would be well-placed to assist in meeting this, noting that: Luton Borough shares a housing market area with Central Bedfordshire Council; and Stevenage Borough falls within the North, East and Central Herts sub-region.

Having made these initial points, unmet need risk from three directions is discussed below.

Risk of unmet need from the south

Beginning with **Three Rivers District**, a recent Regulation 18 consultation proposed three new allocations for a total of a housing supply of 825 homes. Additionally, a consultation in 2021 proposed supply of 8,973 homes, leading to a total supply of 9,798 homes, which is 1,318 homes short of the standard-method derived LHN figure. Assuming the need for a supply buffer (i.e. a need to ensure supply in excess of the housing requirement), the unmet need figure might increase to ~1,500 homes. Additionally, the most recent consultation document (see paragraph 2.2) discusses a need to reduce the supply by 438 homes (due to issues with certain of the sites proposed for allocation in 2021), which might lead to **unmet need in the region of 2,000 homes**.

Moving west to **Watford Borough**, the adopted Local Plan (2022) sets the housing requirement at LHN. As such, the conclusion is **no risk of unmet need**. However, there is a need to note the recent Authority Monitoring Report (March 2022), from which it is clear that meeting the requirement may prove challenging.

The final authority in this sector is then **Hertsmere Borough**. A draft local plan was published in 2021, proposing to provide for housing need in full. However, a report to Full Council in 2022 explained that the consultation generated a very large number of responses and *"the vast majority of the responses expressed objection to the level of new development."* The Full Council then resolved to "set aside" the Local Plan, as previously published, but to continue to work on a local plan. As such, there is **a risk of significant unmet need**.

Finally, there is a need to note the risk of unmet need from **London boroughs**. The Barnet Local Plan is progressing well, but the same cannot be said for the Enfield Local Plan, whilst Harrow has seemingly not undertaken any local plan-making work since a Site Allocations Plan was adopted in 2013. In both the case of the submitted Barnet Local Plan (2021) and the Draft Enfield Local Plan (2021) the proposal is to provide for the London Plan requirement, but the plan documents are clear that housing need is potentially much higher and, indeed, potentially even more than double the London Plan requirement. The next London Plan will need to deal with housing needs as fully as possible and potentially seek locations to meet unmet housing need.

Dacorum Borough

A Draft Plan published in 2020 proposed to set the housing requirement at LHN and proposed a housing supply modestly above that requirement. However, evidence subsequently emerged in respect of a key constraint to growth, namely recreational pressure on the Chilterns Beechwoods Special Area of Conservation (SAC). This constraint also affects the west of St Albans District, and is discussed further below, but a key point to note here is that a Mitigation Strategy was adopted in 2022. The need for growth to align with the Mitigation Strategy could potentially prove a barrier to setting the housing requirement at LHN, such that there is **a risk of unmet need**.

Welwyn Hatfield Borough

The local plan examination has proved challenging, with the plan having been submitted for examination in 2017. However, a major step-forward was taken in January 2023, when proposed modifications were published for consultation. The plan is based on a housing need figure of 730 dpa (significantly lower than standard-method derived LHN), and the proposal is to set the housing requirement at 738 dpa to 2032/33 and then 885 after that. On this basis, supply would total the requirement (with virtually no supply buffer) for the first ten years of the plan period only, with a total supply of just 839 homes beyond that ten-year period. The situation is obviously very complicated, but ultimately there are clear reasons to suggest **unmet need could be an issue**.

Conclusion on housing quanta options

5.2.19 In light of the discussion above, there are strategic arguments for setting the housing requirement at a figure both above and below LHN. This leads to an **inherent challenge**, in respect of preparing the St Albans Local Plan, in the absence of a higher-level plan to distribute growth across the sub-region.

5.2.20 In turn, there is an argument for awaiting the outcomes of the South West Herts Joint Strategic Plan. However, this is not a realistic option. There is a critical need for an up-to-date local plan in order to avoid the risk of Government intervention and to avoid a continued risk of 'planning by appeal'.[8]

5.2.21 One conclusion that might be drawn is that arguments in both directions ultimately cancel each other out and lead to a strategic argument for setting the housing requirement at precisely LHN. In this respect, it is important to note that the plan is being prepared under the 2021 version of the NPPF that has been widely described as having its core "mandatory housing targets". We do not believe this to be the case; however, the reality is that most local plans do set the requirement precisely at LHN. The wording of the 'positively prepared' test of soundness in the NPPF (paragraph 35) is particularly strong: *"… provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs..."*

5.2.22 Given the inherent challenge, further supporting analysis is presented in **Appendix III**. Specifically, the appendix presents an appraisal of the following housing quanta (housing requirement) alternatives: 300 dpa (the approximate figure that could be provided for without greenfield Green Belt release); 600 dpa (a low growth scenario that might be considered in order to reflect Green Belt constraint); 900 dpa (a figure suitably close to standard method LHN); 1,200 dpa (a reasonable high growth 'bookend'). The appraisal is *inherently limited*, because it is undertaken with no assumptions regarding spatial strategy / distribution of growth, let alone specific sites that would be allocated. However, it does serve to highlight very significant drawbacks to very low or high growth. In this light, SADC officers (in discussion with AECOM) were able to reach a conclusion that attention should focus on scenarios that would involve setting the housing requirement at a figure that falls somewhere in the middle of the above range, i.e. it is reasonable to **rule-out very low growth and very high growth** for current purposes and in current circumstances.

5.2.23 The question of precise quanta figures to reflect across the growth scenarios is returned to within Section 5.5, subsequent to consideration of broad distribution, site options and sub-area scenarios.[9]

Box 5.3: *A note on employment land need*

The South West Herts Economic Study Update (2019; N.B. a further update is forthcoming) considers a series of scenarios for future demand in respect of both office space and industrial land, ultimately supporting the highest growth scenarios for office space and (in particular) industrial land. For industrial land it states: *"Although this is a considerable change we believe it is justified by the consistently strong levels of demand for industrial space in South West Herts, which could have been even higher if the market was not undersupplied."* The study then considers supply (N.B. as well as committed supply it assumes supply from East of Hemel Hempstead; see paragraph 9.18 of the report), before predicting: an over-supply across the sub-region in respect of office space; and a large undersupply in respect of industrial land, but with an oversupply within St Albans.

[8] The adopted Local Plan is the second oldest nationally. The York Local Plan is older but the new York Local Plan was submitted for Examination in 2018 and with a consultation on main modifications in 2023. On this basis, there is a risk of Government intervention to ensure that a Local Plan is adopted. With regards to 'planning by appeal', there is in the order of 3,500 homes at the current time currently being proposed at Green Belt sites where the proposal is at the pre-application, application or appeal stage, and indications are that more proposals will be forthcoming. This is unprecedented.

[9] It is important to reiterate that there is invariably a need to provide for a supply buffer over-and-above the housing requirement. This is to ensure that the requirement is met in practice over the plan period, i.e. there is a robust supply 'trajectory', recognising that unforeseen delivery issues inevitably occur at the development management (planning application) stage. A "robust supply trajectory' involves a situation whereby a five-year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period, and the Housing Delivery Test (HDT) can be met when applied annually.

There is also a need to consider the question of a constant/consistent versus a stepped housing requirement. The ideal situation involves a consistent housing requirement over the entire plan period. However, under the Government's PPG, there is flexibility to set a 'stepped' housing requirement (and, in turn, supply trajectory), where there is evidence to demonstrate that this is necessary. A stepped requirement / trajectory is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then compensated for in the latter years of the plan.

The following statement from the Uttlesford Local Plan Inspector's Report (2020; available here) is indicative of the flexibility that exists in respect of committing to a stepped housing requirement through a local plan: *"In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year housing land supply"… This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing. It would also create a buffer so the target of 14,000 homes is not only just being met by a narrow margin and would allow for a less steeply stepped housing trajectory".*

Broad distribution

Introduction

5.2.24 This is the second of two sections examining 'strategic factors' of relevance to the matter of defining reasonable growth scenarios for the Local Plan. The aim is to explore broad distribution issues / options as well as the question of broad growth typologies that are supported, e.g. strategic versus non-strategic.

5.2.25 Detailed findings are presented in **Appendix IV**, with summary findings set out below.

Summary findings

5.2.26 The review presented in Appendix IV is not comprehensive, with many further strategic issues and options discussed in Section 5.4 and also the appraisal sections of this report. However, on the basis of the review presented in Appendix IV, key messages to inform the definition of growth scenarios include:

- **Hemel Garden Communities (HGC)** – has strong support amongst partner organisations (St Albans City and District Council, Dacorum Borough Council, Hertfordshire County Council, Hertfordshire Local Enterprise Partnership and Hertfordshire Innovation Quarter). Dacorum's local plan is delayed, but given constraints to growth, in particular the Chilterns Beechwoods Special Area of Conservation (SAC), there will likely be heavy reliance on HGC to deliver homes, including given the potential to deliver extensive Suitable Alternative Natural Greenspace (SANG). Much work has been completed, and is ongoing, that explores HGC as a whole, and there has *not* been a focus on exploring scenarios involving significantly reduced growth within the St Albans part. Notably, the September 2022 presentation to the St Albans Local Plan Advisory Group (LPAG) explained that scenarios are being examined involving between c. 9,600 – 11,500 new homes (with a focus on exploring implications for three key issues, namely the Gade Valley, SANG provision and secondary school provision). The presentation also explained that: *"Infrastructure modelling and financial viability assessment [is] underway."*

  In this light, it is clearly the case that the HGC scheme would likely struggle to progress without the St Albans components, which are notably distant from the Gade Valley and proposed for secondary school provision, employment provision and a large proportion of SANG provision.

  HGC is very important for the sub-region (i.e. is of 'larger-than-local significance), just as Harlow-Gilston Garden Town is of crucial importance for its sub-region (Harlow, Epping Forest and East Herts).

  Furthermore, there is a strong argument for HGC when viewed through a St Albans district-specific lens. This reflects both the inherent opportunities associated with strategic growth, in terms of comprehensive masterplanning and planning for infrastructure delivery alongside housing, and also location-specific opportunities, including supporting the aspirations for the A414 corridor (including HERT; see Appendix III) and delivering strategic expansion of Maylands employment area / delivering the largest element of the Hertfordshire Enterprise Zone (Herts IQ) which is of local and *at least* sub-regional significance.

  Without HGC there would clearly be a need to make very difficult decisions in respect of: A) not meeting housing and employment needs (i.e. generating unmet needs); and/or B) releasing land from the Green Belt at the edge of settlements (given a lack of new settlement options locally; see Section 5.3). There is every chance that such decisions would prove politically too difficult, such that there would be a risk of the Local Plan failing, as per the last two attempts to deliver a local plan. On this note, it is important to recall that the current St Albans Local Plan is the second-oldest local plan nationally and, in turn, St Albans is at risk of intervention from the Government in order to get a local plan in place.[8]

  A further specific issue is meeting Gypsy and Traveller accommodation needs, with it being apparent that the St Albans Local Plan would likely generate significant unmet need in the absence of HGC, in the context of a sub-region where unmet need is already an issue (or, at least, a potential issue).

  However, on the other hand, HGC is associated with a range of issues such that there is a need for further testing. The Chilterns Beechwoods SAC issue is foremost, potentially followed by the Chilterns AONB, but there are a range of other issues that warrant further consideration at the Local Plan stage.

  The question is whether or not it is appropriate to test the 'no HGC' option, given strong arguments to suggest that this option is unreasonable, and mindful that testing this option could serve to distract from, and limit the potential to explore, other choices for the Local Plan. Ruling out 'no HGC' as unreasonable might represent best practice; however, doing so could generate a risk of challenge. The matter of reasonable HGC options to progress to the reasonable growth scenarios is discussed further below.

- **Strategic sites** – regardless of whether or not there is support for HGC, there is a clear argument for ensuring a strong focus on strategic sites, i.e. sites delivering at least several hundred homes that are suited to comprehensive masterplanning and tend to support a mix of uses onsite and delivery of new / upgraded infrastructure alongside new housing. This is evidenced by work completed to date on the South West Herts JSP as well as the work of the Hertfordshire CC Growth and Infrastructure Unit and the Hertfordshire Growth Board. It is also noted that the previous version of the new St Albans Local Plan (submitted in 2018, withdrawn in 2020) included a major focus on strategic scale sites to deliver new infrastructure alongside housing. Strategic sites can also be well-suited to integrating one or more sites for Gypsies and Travellers, which is a significant issue locally.
- **Smaller sites** – as discussed, a key lesson learned from the experience of the previous (withdrawn) local plan is that there is a need for a good mix of sites, to include smaller sites. A good mix of sites is important from a perspective of seeking to minimise delivery risk, but there are also wider merits to smaller sites, notably: the NPPF supports smaller sites because they can allow for *"opportunities for villages to grow and thrive, especially where this will support local services"*; smaller sites are suited to delivery by SME housebuilders; and small Green Belt sites can sometimes be developed with limited impact on the wider Green Belt. There can also be a traffic argument for dispersing growth across smaller sites; however, on the other hand, focusing growth (at strategic sites or along transport corridors) can support early and effective transport planning, including for strategic upgrades.
- **Transport connectivity** – is a key issue locally, with implications for wide-ranging sustainability objectives, including climate change mitigation. The option of focusing growth along transport corridors was found to perform strongly through the recent SW Herts South West Herts Joint Strategic Plan (JSP) consultation, and the option of 'growing the best-connected places' also performed well. Growing the best-connected places could mean an overwhelming focus on Hemel Hempstead, St Albans and Harpenden or, alternatively, distributing growth in accordance with the settlement hierarchy. Also, there is a need to recognise that settlements function in clusters. This is recognised in the NPPF (para 79) and applies quite strongly in both the north and the south of St Albans District.
- **A414 and Mass Rapid Transit (MRT)** – discussion of strategic opportunities / options for the A414 corridor, including a possible Hertfordshire Essex Mass Rapid Transport (HERT) has been ongoing for several years. There was then a presentation to LPAG in September 2021, which emphasised the links between HERT and the wider A414 strategy, as well as complexities and challenges associated with realising scheme objectives. The project then hit a milestone in late 2021, when there was an initial consultation; however, no significant progress has been reported since that time. The initial consultation covered: need and benefits of the HERT; principles including the vision and potential key features; current travel behaviours and the possible trips that could be made using the HERT; and towns and interchanges the HERT could serve, between Hemel Hempstead / Watford and Harlow.
- **Other transport priorities** – there is clearly a need to support accessibility to the two mainline train stations, and the Abbey Line also provides important connectivity to Watford, with a need to support patronage. There are also key bus services to account for as part of spatial strategy and site selection, including with a view to supporting and potentially enhancing services; this includes key north / south and east / west routes through St Albans. There is also a good network of cycle infrastructure locally, including two offroad routes along former railways, with significant opportunities to deliver enhancement. Finally, an important transport consideration is the need to account for increased HGV movements in the south of the District as a result of the Government-permitted SRFI.
- **Education** – a review of Duty to Cooperate (DtC) meetings serves to highlight discussions with Dacorum Borough regarding the need for a secondary school to serve Hemel Hempstead to come forward within St Albans part of HGC. Also, there is also a need for new secondary school capacity at St Albans and at London Colney, and this is also important from a transport/traffic perspective.
- **Green and blue infrastructure** – is another key issue, in light of the recent SW Herts JSP consultation. Reasonable growth scenarios must be defined mindful of both strategic constraints and opportunities. A series of new country parks is set to come forward alongside the Government-permitted SRFI, and other opportunities of similar significance might be explored, including around enhancing river corridors and improving access to woodlands. Bricket Wood Common is a key sensitivity in the south.
- **Urban capacity** – it almost goes without saying that there is a need to maximise urban capacity, in order to minimise pressure on the Green Belt. In some urban areas there can be a strategic choice, in terms of development clusters and density (including building heights), but it is not clear that there is any such strategic choice in the St Albans context. There is also a need to be mindful that identified urban housing land supply can be associated with high delivery risk in comparison to greenfield.

5.3 Site options

Introduction

5.3.1 The aim of this section is to introduce the long list of available site options feasibly in contention for allocation and the work that has been undertaken to appraise sites in isolation. This is a 'bottom-up' workstream undertaken as a component of the wider process of defining reasonable alternative (RA) growth scenarios for appraisal and consultation (see Figure 5.1).

5.3.2 This section covers:

- Housing and Economic Land Availability Assessment (HELAA)
- Urban Capacity Study
- Green Belt Review
- Officer-led site assessment
- New settlement options
- GIS analysis (Appendix V of this report)

HELAA

5.3.3 The HELAA was published in 2021 and reported to LPAG in January 2022. The starting point was a long list of sites submitted to the Council through a call for sites (2021; see Figure 5.2) plus other sites submitted to the Council since 2016. Each of the sites was then assessed under three broad headings: availability, achievability and suitability. Figure 5.3 shows all HELAA sites, and other maps showing HELAA sites are available at: www.stalbans.gov.uk/housing-and-economic-land-availability-assessment.

5.3.4 In total, 384 sites were assessed, of which 354 were 'progressed', in that they were found to be available, achievable and suitable (in HELAA terms).[10] The total capacity of the progressed sites is 58,175 homes,[11] of which 57,620 homes is from Green Belt sites (i.e. urban HELAA capacity is just 555 homes).[12]

5.3.5 Capacity from progressed HELAA sites was combined with supply from two other sources (windfall and capacity identified through the Urban Capacity Study, as discussed below) to arrive at a total potential supply figure of 63,079 homes. Some of this capacity is from sites that are 'committed' (i.e. sites with planning permission or an allocation in a made neighbourhood plan), and some of the sites would deliver beyond the plan period. Regardless, the simple message is that the capacity / yield of progressed HELAA sites is far in excess of the number of homes required under any reasonably foreseeable scenario.

Urban Capacity Study

5.3.6 In parallel with the HELAA, SADC officers also undertook an assessment of all urban land in the District, with a view to: A) identifying sites to progress over-and-above those submitted to the Council; and B) ensuring a targeted, strategic approach in respect of development density assumptions.

5.3.7 The Urban Capacity Study was published in January 2022, explaining that a shortlist of 294 sites was initially identified, before being reduced to a shortlist of 215 sites via a three-stage process. The Study reports that the total capacity of these sites is 2,174 homes, of which 1,411 homes would be delivered in the 'density uplift areas' within St Albans and Harpenden (close to the town centre or train station).

5.3.8 The 2,174 homes figure was reported in the HELAA (as discussed above). Subsequently Stage 4 of the Urban Capacity Study was completed, which deals with confirming the availability and achievability of sites. On the basis of this work, latest understanding is that the 2,174 homes figure reduces to 775 homes.

5.3.9 This figure is subject to change. However, at the current time it is not clear that there is a strategic choice to be made, in respect of urban capacity (overall or for any particular urban area within the District).

[10] In the great majority of cases sites were sifted-out through the HELAA due to availability concerns or due to being too small. Just nine sites were sifted out due to suitability concerns (flood risk in six instances, and heritage impact in three).
[11] Paragraph 3.12 of the HELAA Report explains how the matter of overlapping HELAA sites was dealt with. Specifically, where sites overlapped capacity was calculated using only the most recently submitted site, in order to avoid double counting.
[12] Of this urban HELAA capacity a considerable amount comes from employment sites, such that there is a key policy choice to be made between retaining employment land versus redeveloping for housing or mixed use development.

Green Belt Review

5.3.10 The Green Belt Review is a major study that has been a number of years in the making and is a key input to the process of defining reasonable growth scenarios. A version of the Green Belt Review was published in 2013/14, setting out work in two stages; however, there were a number of criticisms of Stage 2 by the Inspectors in 2020. These criticisms have been taken on board through a new Green Belt Review Stage 2 (2023). The new work in 2023 confirmed that the Stage 1 work from 2013/14 remains valid.

5.3.11 Stage 1 reached high level conclusions (see Figure 5.3), whilst Stage 2 gives detailed consideration to detailed land parcels, including HELAA sites falling within a 'settlement buffer'.[13] Stage 2 reaches two conclusions for each of the land parcels assessed: 1) Overall performance against the NPPF purposes – see green shading in Figure 5.4; and 2) Strategic importance to the wider Green Belt – see blue, red and amber lines in Figure 5.4. Giving particular weight to the latter consideration, the Stage 2 Review then recommends land parcels for further consideration (either in isolation or in-combination) – see Figure 5.5.

N.B. Green Belt Review findings are just one factor amongst many when considering 'exceptional circumstances' to justify releasing land from the Green Belt. There is also a need for *"sustainable patterns of development"* (NPPF para 142) including a focus on *"land which has been previously-developed and/or is well-served by public transport."* The Welwyn Local Plan Inspector notably stated in 2021:[14] *"Those sites that cause least harm to the green belt's openness and purposes whilst at the same time favouring those that score best from a sustainability perspective should be chosen. These could be opposing forces; in which case a balance would need to be struck according to the weight of evidence."*

Officer-led site assessment

5.3.12 A ten-stage 'site selection methodology' was presented to LPAG in June 2022, with a distinction between early quantitative analysis (Stages 3, 4 and 5) and subsequent targeted qualitative analysis (Stage 6). The approach was subsequently piloted and adjusted, including with a focus on simplification. Central to the refined methodology is a consistent assessment for a lengthy shortlist of site options.

New settlement options

5.3.13 There are not considered to be any realistic new settlement options. A site is being promoted at Harperbury Hospital (see vision document), but is poorly connected in transport terms, amongst other issues. The only other new settlement-scale HELAA site is found to the north of Redbourn / West of Harpenden, but this site is also poorly connected, and comprises raised and undulating land closely associated with the Chilterns dip slope. Looking beyond HELAA sites, a new settlement area of search might ideally focus on the train line to London. However, the only feasible location is to the north of St Albans (given the Government-permitted SRFI) and there is no potential to deliver a new station here.

GIS appraisal of site options

5.3.14 As a supplementary exercise, all 384 site options considered through the HELAA were subjected to GIS analysis (e.g. distance to a listed building; intersect with a flood zone). The outcomes of this analysis are presented in **Appendix V**. However, it is important to note that this is a minor input to the overall process, mindful that A) there are inherent limitations to GIS analysis; and B) the analysis does not lead to overall conclusions or recommendations in respect of which sites to progress (unlike the HELAA and the Green Belt Review). Nonetheless, the analysis is available to inform the consideration of site options presented in Section 5.4, plus it is recognised that there is often an expectation amongst stakeholders (and Local Plan Inspectors) that all site options are subjected to appraisal as part of the SA process.

Conclusion on site options

5.3.15 This section has discussed the **targeted and proportionate** work undertaken to examine site options in isolation. The outcome is an understanding of those sites that warrant being a particular focus of the discussion in Section 5.4 and an evidence-base to inform the discussion.

[13] It is proportionate for GB Review to focus on land reasonably well-connected to a settlement. Two buffers were applied, according to position in the settlement hierarchy, and settlements abutting the district boundary were also considered.
[14] This quote was included within a presentation to LPAG in January 2022.

Figure 5.2: *Site options submitted through the call for sites in 2021*

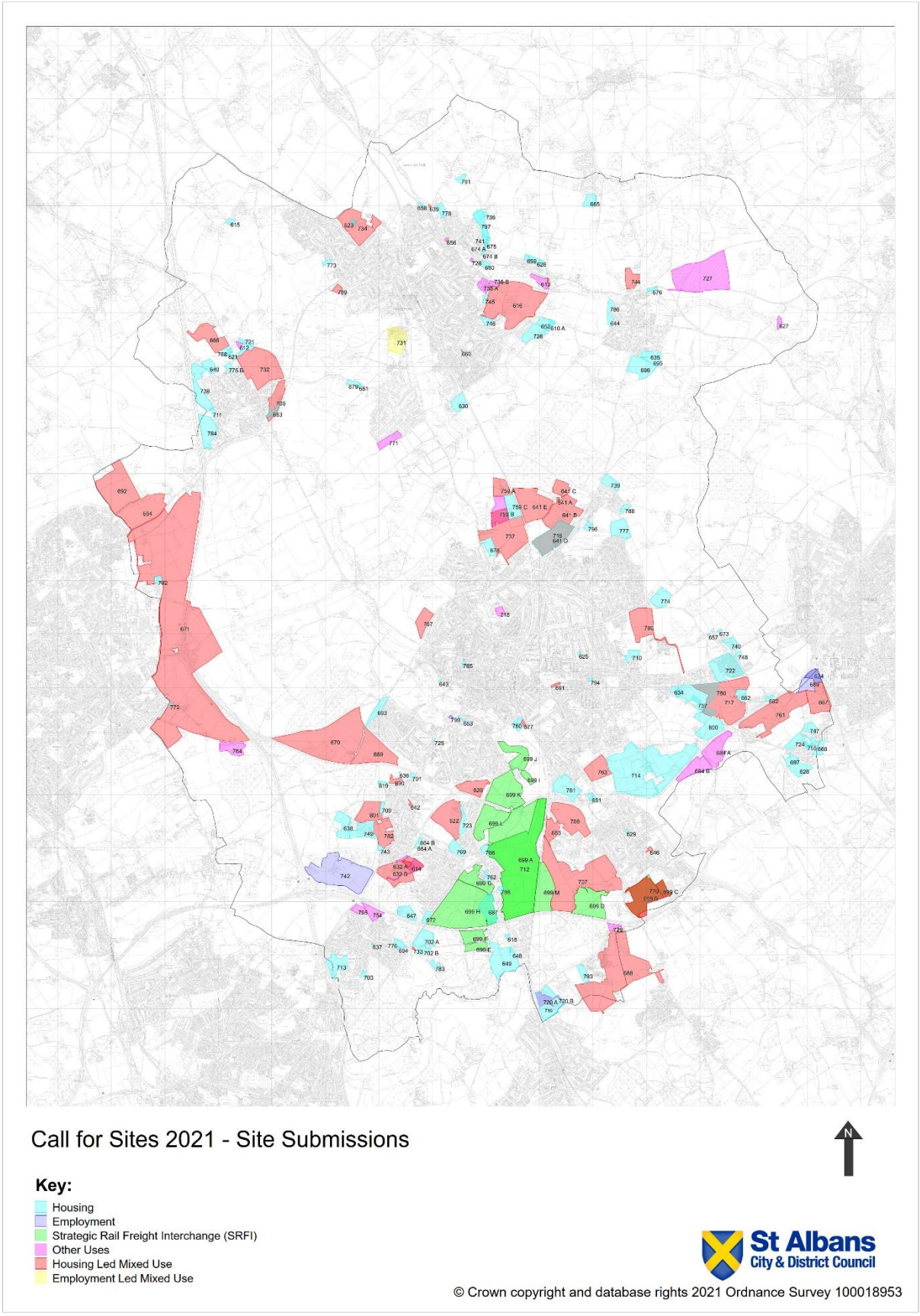


Figure 5.3: *All HELAA sites*

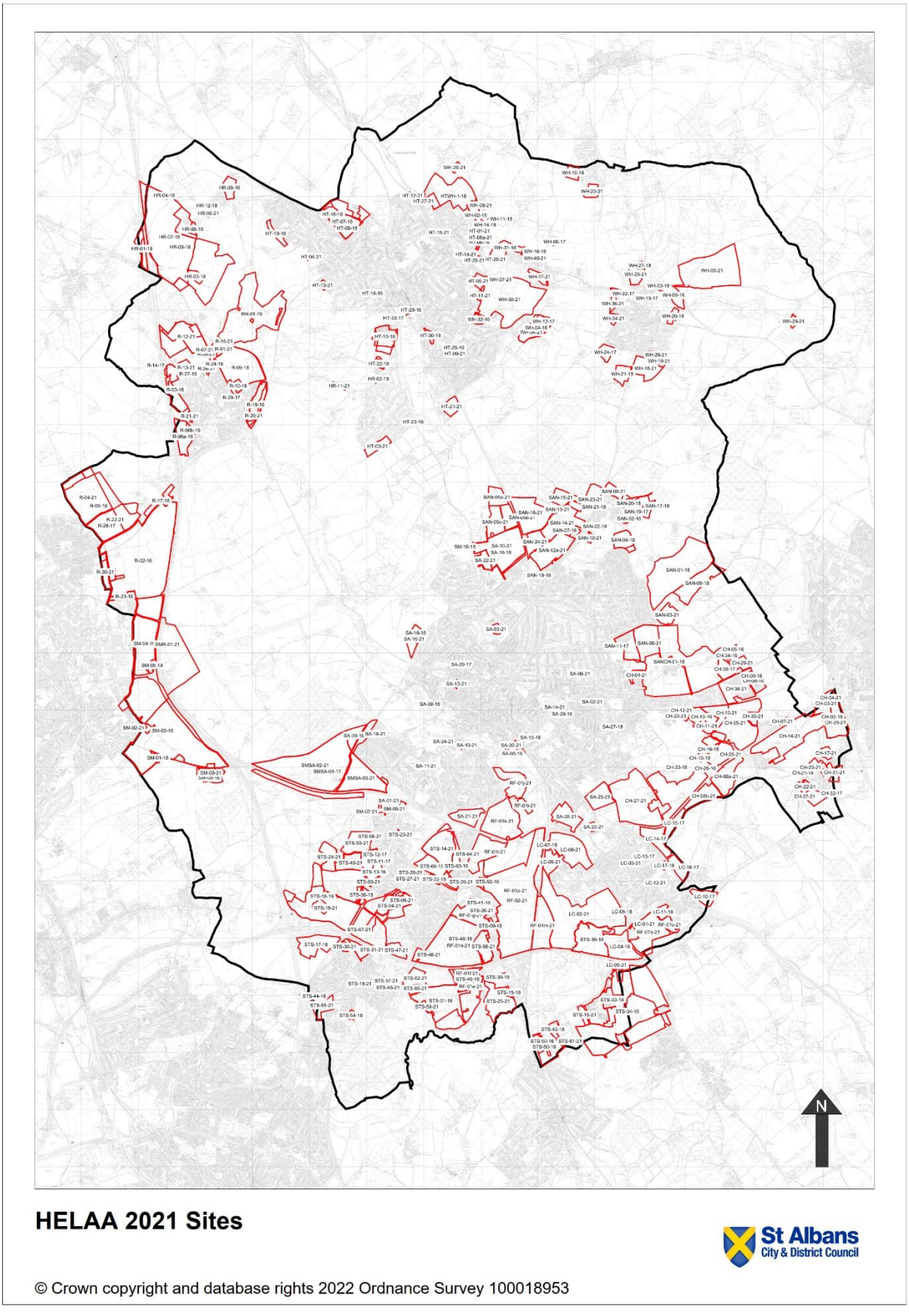
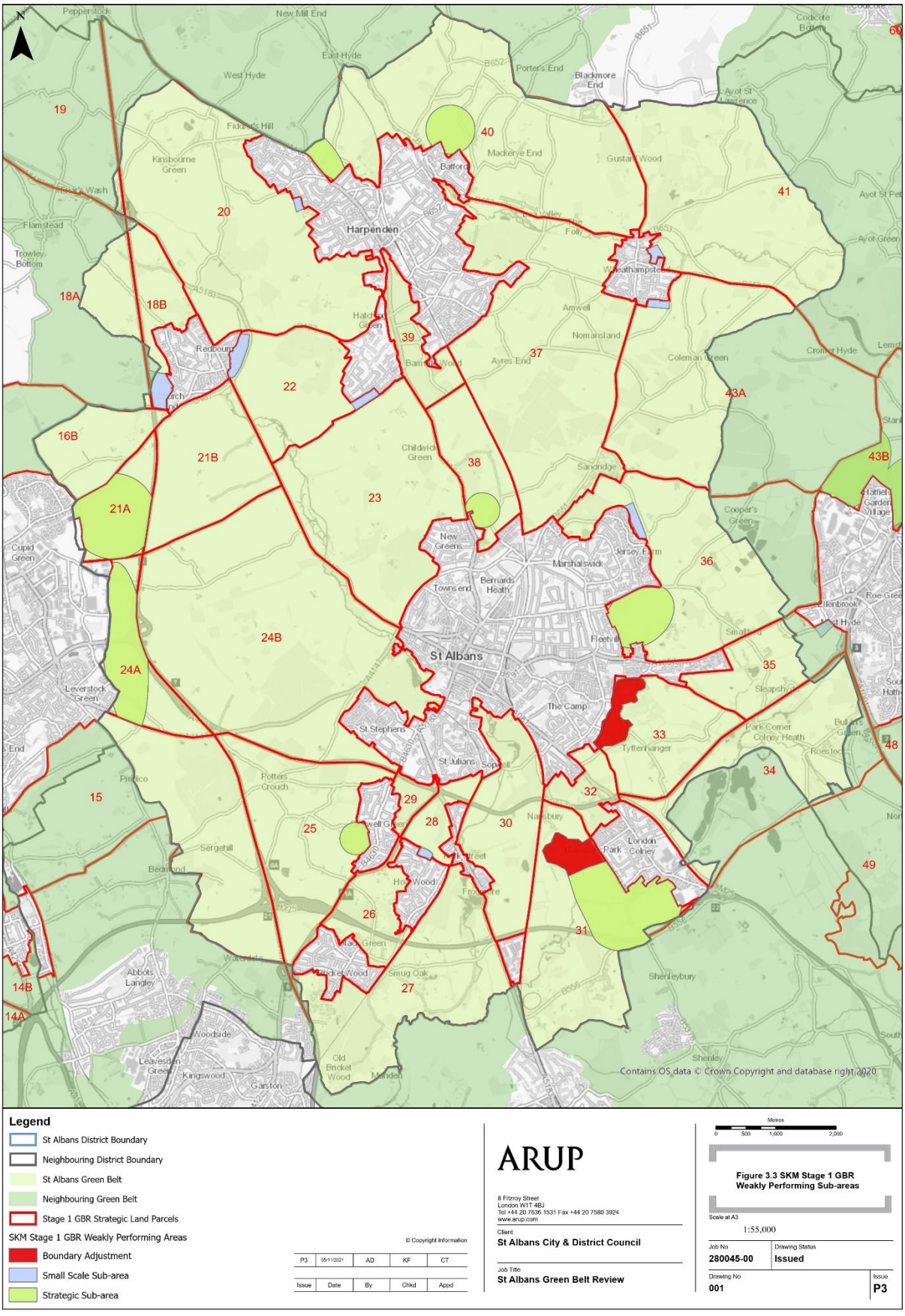
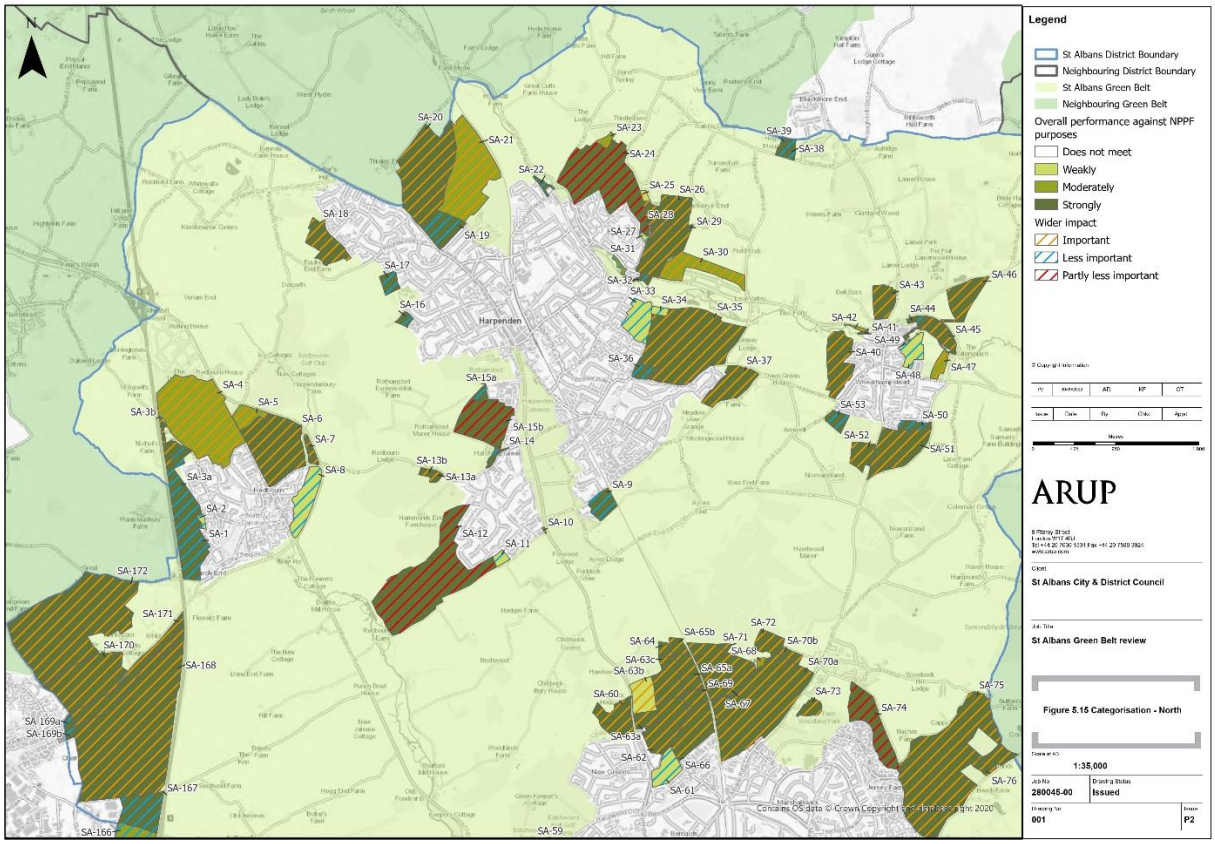


Figure 5.4: *Weakly performing Green Belt areas identified through Stage 1 of the GB Review*



NB: To reiterate, this map was originally produced by SKM in 2013 for the Stage 1 Green Belt Review.

Figure 5.5: *Findings of the Stage 2 Green Belt Review (north and south of the District)*



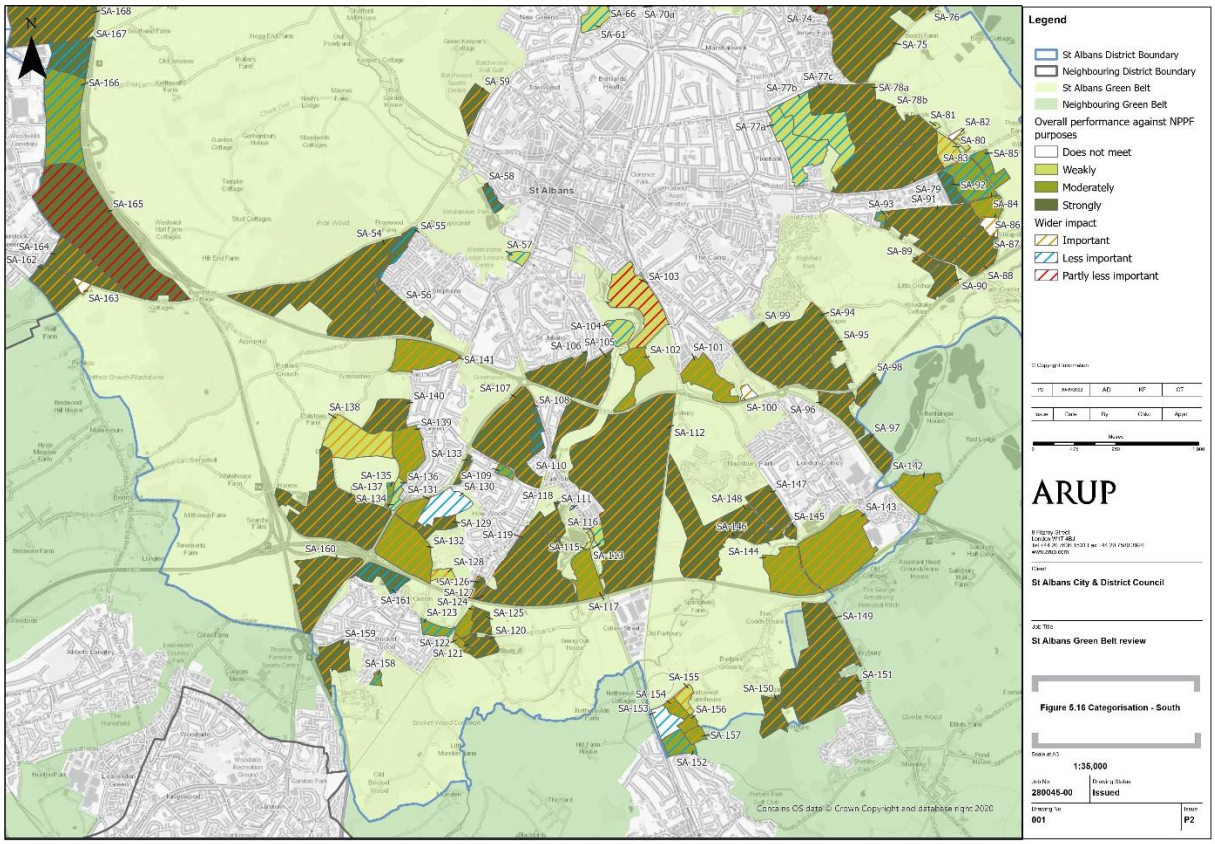
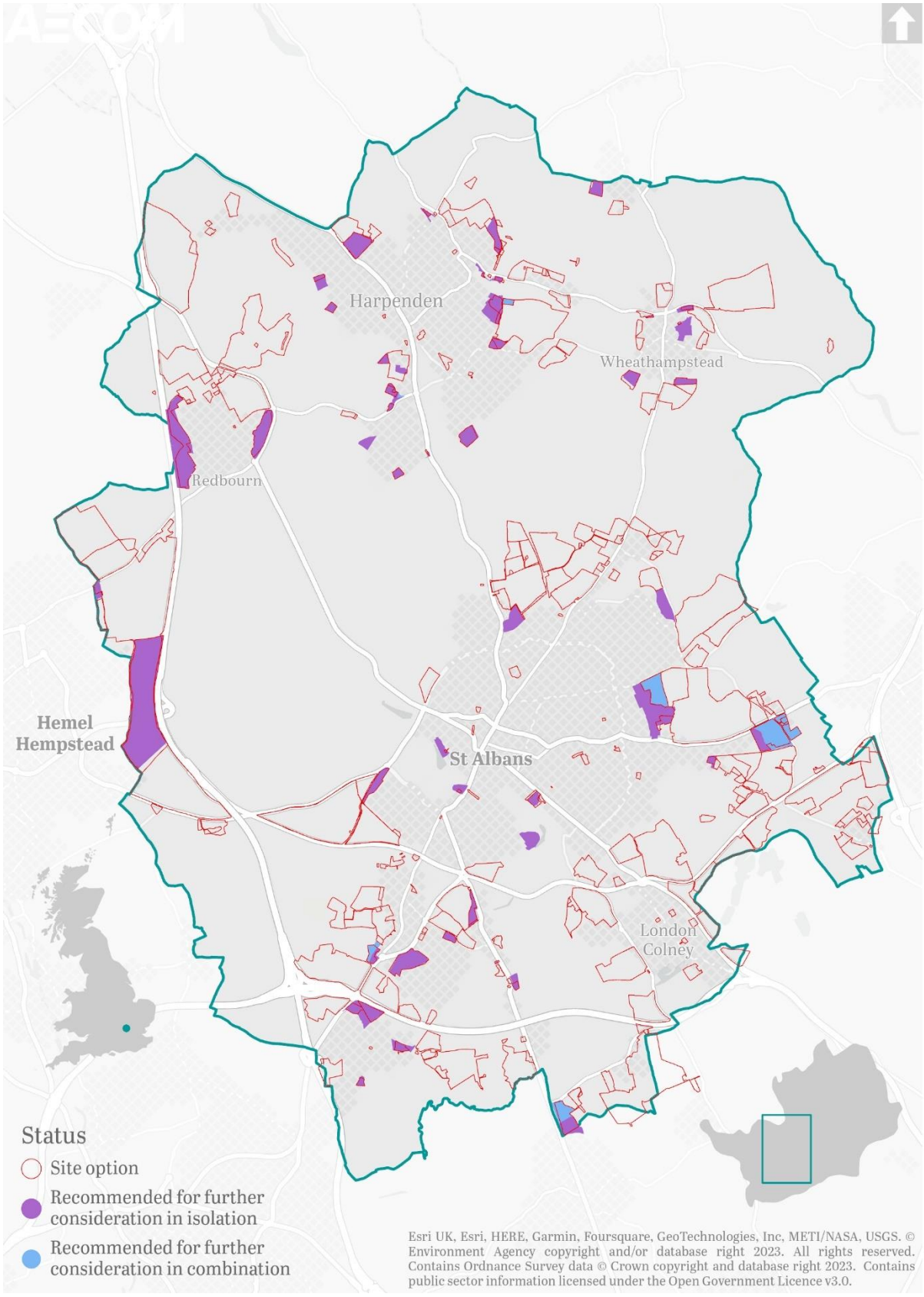


Figure 5.6: *Green Belt Review recommended land parcels overlaid on select site options*[15]



[15] There are three points to note. Firstly, this figure does not show HELAA sites set to deliver with the Government permitted SRFI and associated country parks (in the vicinity of Park Street / Frogmore / London Colney). Secondly, the figure aims to avoid showing overlapping sites; where there are overlapping sites it is typically appropriate to simply show the most recently submitted version, but in some instances a judgement call has been made regarding which version to show. For example, in some cases it was considered appropriate to show the larger of two overlapping sites. Thirdly, the figure shows several recent sub-divisions of HELAA sites (i.e. sub-divisions made post publication of the HELAA) and one new site (west of Rothamsted Research).

5.4 Sub-area scenarios

Introduction

5.4.1 Discussion has so far focused on A) 'top down' considerations of housing quantum and broad distribution issues / options; and B) 'bottom-up' consideration of site options. The next step is to consider each of the District's sub-areas in turn, exploring how sites might be allocated/ supported in combination.

5.4.2 Detailed findings are presented in **Appendix VI**, with summary findings set out below.

What sub-areas?

5.4.3 There is a need to define sub-areas taking into account the pattern of settlement (first-and-foremost), parish boundaries and the distribution of realistic site options. The following sub-areas were defined:

- North and east of Hemel Hempstead
- St Albans (inc. Colney Heath)
- Harpenden
- London Colney
- Redbourn
- Wheathampstead (inc. Gustard Wood)
- Bricket Wood
- Chiswell Green, How Wood and Park Street / Frogmore
- Edge of Radlett (N.B. Radlett is within Hertsmere District)

Methodology

5.4.4 The aim of the detailed review presented in Appendix VI is to conclude on reasonable sub-area scenarios that need to be taken forward to Section 5.5 of the report, where sub-area scenarios are combined in order to arrive at reasonable growth scenarios for the District as a whole.

5.4.5 The aim is *not* to present a formal appraisal of reasonable alternatives. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to precisely the same level of detail, but rather to focus attention on those options (and site combinations / scenarios) *judged* to be more marginal, i.e. where the question of whether or how to take the option forward is more finely balance. This approach is taken mindful of the legal requirement, which is to explain reasons for arriving at reasonable alternatives in "outline" terms.

Summary findings

5.4.6 Within each sub-area the key task is to consider Green Belt release options.

5.4.7 For all of the settlements there is a clear strategic case for at least exploring Green Belt release options. Strategic arguments vary across settlements, but there is also a need to factor-in site specific arguments.

5.4.8 When considering Green Belt release options the first port of call is: **A)** HGC; and **B)** strategic urban extension options comprising land recommended for further consideration by the Green Belt Review. In respect of (B), there are four such sites, or five if you also count part of HGC.

5.4.9 The next port of call is then **C)** sites *not* recommended for further consideration by the Green Belt Review (or, at least, not in full) but where there is the potential to deliver a strategic urban extension to include targeted new / upgraded infrastructure; and **D)** non-strategic sites 'recommended' by the GB Review. In respect of (C), there are four such sites (with a distinction between two that would deliver a new secondary school, and two that would not deliver a secondary school, but nonetheless deliver infrastructure benefits).

5.4.10 There is also the specific matter of two Green Belt PDL sites, which are difficult to place within a sequential order of preference. Both sites have issues; however, on balance, it is fair to assume allocation of both as a 'constant' across the reasonable growth scenarios. This is in recognition of NPPF paras 142 and 149, which favour Green Belt PDL, and which could well be given weight by a planning inspector at appeal.

5.4.11 Other site options then perform less well. However, a number are 'noted' in Appendix VI.

5.4.12 Of this latter tier of sites, it is difficult to 'pick winners' to progress to Section 5.5. However, on balance, **three further strategic urban extension options** are progressed, namely:

- Expanded north of St Albans – assumed to deliver 2,170 homes
- South East St Albans – assumed to deliver 880 homes (with a Green Belt gap retained)
- North East London Colney – assumed to deliver 480 homes

5.4.13 These options are progressed particularly mindful of the settlement hierarchy, transport connectivity and support for growth at scale (particularly in the absence of HGC). At all three sites it is difficult to define development extent / quanta with certainty – see discussion of assumptions in Appendix VI and below.

5.4.14 **Figure 5.7** shows the tiers of sites discussed above (with the three relatively poorly performing strategic urban extension options that are nonetheless progressed referred to as 'fallback' strategic options).[15]

5.4.15 Having differentiated between competing site options within each of the sub-areas, the next task was to combine site options into sub-area scenarios. With regards to methodology: Whilst most of the sub-area scenarios are associated with many feasible scenarios there is a pragmatic need to keep the number to a minimum, and also to apply a degree of methodological consistency, all with the aim of ensuring a manageable, understandable and accessible process that can be succinctly reported.

5.4.16 Table 5.1 presents a summary of the sub-area scenarios progressed to Section 5.5. In summary: two scenarios for six sub-areas; three scenarios for two sub-areas; and four scenarios for one sub-area

5.4.17 Final points to note are as follows:

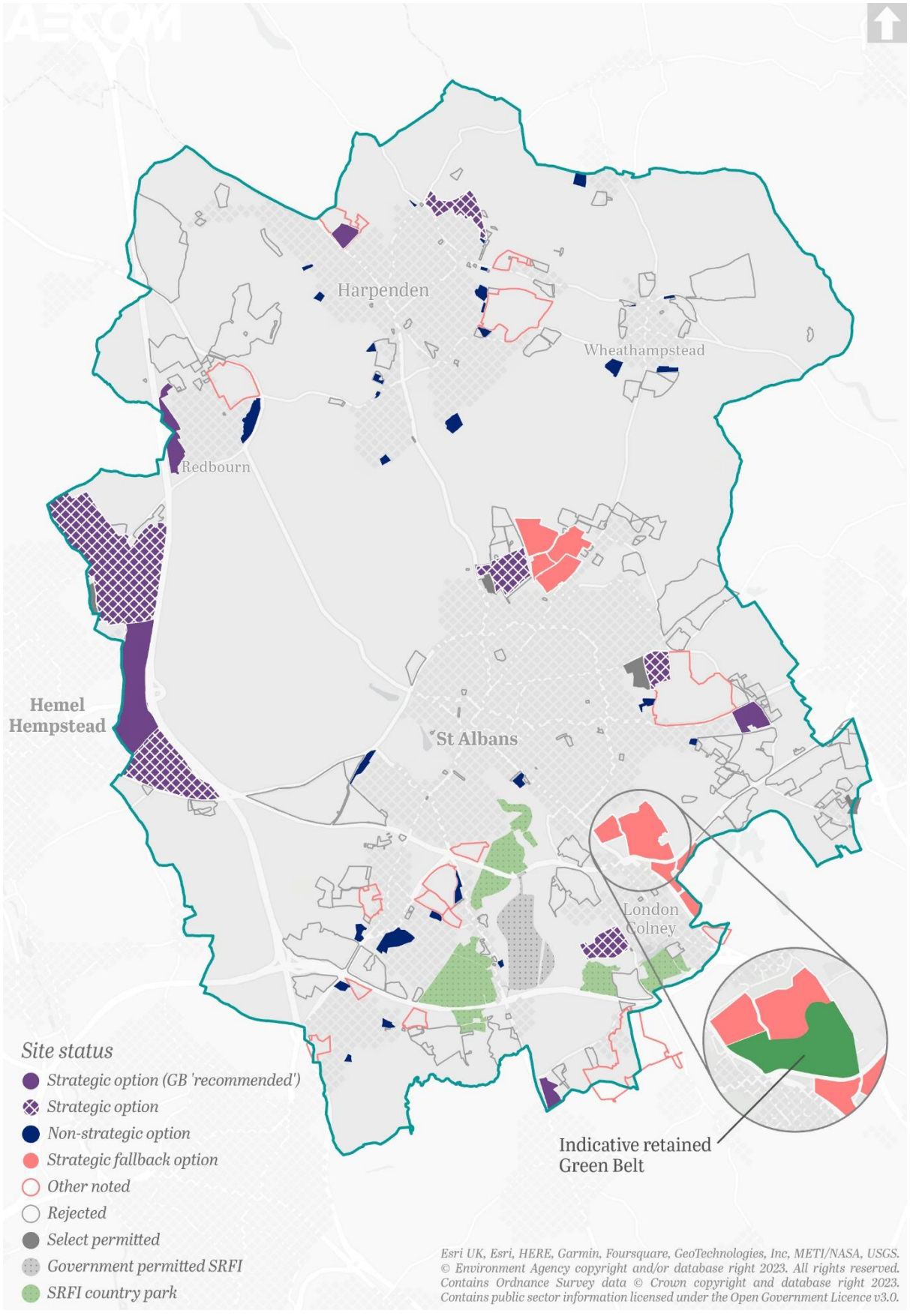
- The table shows new supply via Green Belt release. Additional housing supply comes from planning permissions, urban areas and windfall. See further discussion in Appendix VI and Section 5.5.
- It can be seen that the option of nil Green Belt release is progressed for all sub-areas other than: North and east of Hemel Hempstead (it is considered reasonable to assume that land 'recommended' by the GB Review would be allocated under all scenarios); and St Albans (two PDL sites in the Green Belt).
- It can be seen that there is a considerable range for all sub-areas, which is not ideal. At the next stage it will be important to establish a narrower range of scenarios, including ruling out nil GB release where appropriate. At this current stage it is considered safer to test nil Green Belt release for most sub-areas.

Table 5.1: *Summary of sub-area scenarios*

Sub area	Scenarios for new homes via Green Belt release
North and east of Hemel Hempstead	Two scenarios: 740 or 4,750 homes
St Albans (inc. Colney Heath)	Four scenarios: 144, 809, 2,326 or 5,677 homes
Harpenden	Three scenarios: 0, 963 or 1,561 homes
London Colney	Three scenarios: 0, 405 or 885 homes
Redbourn	Two scenarios: 0 or 661 homes
Wheathampstead (inc. Gustard Wood)	Two scenarios: 0 or 213 homes
Bricket Wood	Two scenarios: 0 or 132 homes
Chiswell Green, How Wood and Park Street / Frogmore	Two scenarios: 0 or 538 homes
Edge of Radlett (N.B. Radlett is within Hertsmere)	Two scenarios: 0 or 274 homes

N.B. in summary, this table shows the sub-area growth scenarios (housing supply from Green Belt release) defined on the basis of the analysis in Appendix VI, as summarised above (and informed by the analysis presented in Sections 5.2 and 5.3 alongside their supporting appendices). Having defined sub-area growth scenarios, the next step (Section 5.5) is to combine them to form a single set of reasonable growth scenarios for the District as a whole.

Figure 5.7: *Site options status established on the basis of the sub-area analysis*[16]



[16] There are three points to note. Firstly, the map does not show sites within the urban areas that are supported for allocation, including two greenfield sites in London Colney, nor does it show two supported Green Belt PDL sites. Secondly, not all rejected HELAA sites are shown (as per Figure 5.6). Thirdly, it is important to emphasise that the 'strategic fallback options' perform poorly relative to the 'strategic options', such that they would only be called upon if absolutely necessary.

5.5 Reasonable growth scenarios

5.5.1 The final step was to **combine sub-area scenarios** into district-wide reasonable growth scenarios.

5.5.2 The logical starting point, in respect of combining sub-area scenarios, is a district-wide scenario involving **low growth** for each sub-area. However, this would involve setting the housing requirement at not much more than one-third of the Local Housing Need (LHN), which equates to unreasonably low growth. To recap, LHN is 888 dpa, plus supply should exceed the requirement (a 'supply buffer'), e.g. by around 5%.

5.5.3 There are then myriad combinations of sub-area scenarios that would result in a reasonable low growth scenario district-wide, hence there is a need for a pragmatic approach.

5.5.4 A logical starting point is a **Green Belt Review-led reasonable low growth scenario**, specifically involving allocation only of those sites recommended for further consideration by the GB Review (2023). This would involve the lowest growth scenario for two sub-areas (East of Hemel and London Colney) combined with the second-lowest growth scenario for the other seven sub-areas.

5.5.5 Combining total supply from Green Belt release (4,085 homes from greenfield plus two PDL sites for 144 homes) with other supply from commitments, windfall and urban supply (5,178 homes),[17] total supply would be 9,408 homes (554 dpa). Accounting for a supply buffer, the housing requirement could then be set in the region of 525 dpa, or~9,000 over the plan period. This is **reasonable growth scenario 1**.

5.5.6 Another readily apparent reasonable low growth scenario would involve the high growth scenario for North and east Hemel Hempstead (i.e. HGC in full) combined with low growth elsewhere. Combining total supply from Green Belt release (4,750 from HGC plus two PDL sites) with other supply (5,178 homes, as per Scenario 1), total supply would be 10,072 homes (593 dpa). Accounting for a (larger) supply buffer, the housing requirement could again be set at ~525 dpa. This is **reasonable growth scenario 2**.

5.5.7 Whilst there are myriad other reasonable low growth scenarios that might feasibly be defined, two is considered to be sufficient, with a view to an accessible appraisal and an engaging consultation.

5.5.8 With regards to scenarios that would enable the housing requirement to be set at or in the region of LHN, it is again the case that there are many feasible sub-area combinations that might be explored. However, taking a pragmatic approach, it is considered reasonable to define, appraise and consult on two scenarios:

- **Reasonable growth scenario 3** – assumes the highest growth scenarios for all sub-areas other than North and East of Hemel Hempstead (i.e. it assumes no HGC). Combining total supply from Green Belt release (10,581 homes) with other supply (5,178 homes), total supply would be 15,459 homes (910 dpa), such that the housing requirement would likely be set at LHN (supply buffer 2%) or slightly below.
- **Reasonable growth scenario 4** – brings in HGC, thus allowing for reduced supply at St Albans and London Colney. Specifically, it allows for the second highest scenario at these settlements. Combining total supply from Green Belt release (10,760 homes) with other supply (5,178 homes), total supply would be 15,938 homes (938 dpa), such that the housing requirement could then be set at LHN (888 dpa).

5.5.9 These four scenarios are considered to be the reasonable growth scenarios at the current time. Whilst there is a strategic argument for appraising one or more **higher growth scenarios** (see Section 5.2), such scenarios are judged to be unreasonable on balance. This reflects concerns with a higher growth strategy, given the site options in contention, namely the 'fallback' strategic urban extension options. As part of this, there are concerns regarding deliverability, given the likely infrastructure dependencies of the sites in question, given recent rates of delivery locally and given the national economic outlook.[18] The Local Plan must not be 'set up to fail' with a housing requirement that cannot be delivered in practice (albeit there might be scope for a stepped housing requirement). Other pragmatic considerations are:

- A need to keep the number of reasonable growth scenarios to a minimum.
- The current national context, including in respect of the Draft NPPF (December 2022).
- The potential to appraise higher growth scenarios subsequent to the current consultation.

[17] Urban supply breaks down as: four Harpenden Neighbourhood Plan allocations; two brownfield HELAA sites; two greenfield HELAA sites (at London Colney); and additional supply identified through the Urban Capacity Study. Windfall is assumed supply from sites that can be expected to come forward outside of local plan allocations. Appendix VI presents information by sub area.
[18] A report on housing delivery was presented to LPAG in March 2022. Average delivery 1994 has been 397 dpa. Rates of delivery have been higher over the past five years (455 dpa), but the most recent monitoring year saw just 314 homes delivered.

5.5.10 Equally, it is recognised that there are arguments for exploring scenarios that would involve setting the housing requirement at a figure more modestly below LHN than is the case under Scenarios 1 and 2.[19] Appendix VI presents further discussion of other options/scenarios to feasibly explore.

5.5.11 Ultimately, the four scenarios are considered reasonable at the current time, but there will be the potential for further work ahead of Regulation 19 publication. Also, it should be noted that *"the phrase all reasonable alternatives does not equate to all conceivable alternatives."*[20]

5.5.12 The **four reasonable growth scenarios** are presented below across:

- Two tables – each taking a different approach to the categorisation of supply components.
- A series of maps – which aim to visually highlight the differences between the scenarios.

5.5.13 Final points are as follows:

- Windfall and urban supply – these terms are defined above (footnote 17). With regards to urban supply, it is important to emphasise that this is inherently associated with some delivery risk, e.g. given uses / land values, complex land ownership and unforeseen development costs. The question of potential reasonable alternative growth scenarios for urban areas will be revisited prior to plan finalisation.
- 'Recommended' Green Belt (GB) sites – feature in the majority of scenarios, namely in Scenarios 1, 3 and 4. These are site options comprising land recommended for further consideration by the Green Belt Review. Most are smaller sites, but there are also four strategic sites (NW Harpenden, West of Redbourn, Glinwells (east of St Albans) and Harper Lane (north of Radlett). Also, the central section of HGC falls into this category, as does the eastern section of the NE Harpenden strategic site option (Scenarios 3 and 4). The great majority of land parcels 'recommended' by the GB Review feature in Scenarios 1, 3 and 4, i.e. few were screened out through the process of defining growth scenarios.
- Other strategic site options – there are four strategic site options judged to perform relatively well despite comprising or including land not recommended for further consideration by the Green Belt Review, such that they feature in Scenarios 3 and 4. These four sites are:
  - North East Harpenden
  - North St Albans
  - East St Albans
  - West London Colney
- Fallback strategic site options – are strategic site options judged to perform poorly relative to the strategic site options listed above, but which might need to come into consideration under a scenario whereby the housing requirement is set at LHN and HGC is not taken forward in full, i.e. Scenario 3.

  Three fallback strategic site options are progressed to the reasonable growth scenarios on balance, but this was quite a marginal decision, with several other potential sites given close consideration as part of the discussion of sub-area scenarios (Section 5.4 and Appendix VI) but ultimately ruled out. The three sites were selected particularly mindful of the settlement hierarchy, transport connectivity and support for growth at scale (particularly in the absence of HGC). Sites ruled out might have some merit when viewed in isolation, but when viewed in combination with sequentially preferable sites their allocation would lead to an unreasonably high quantum of growth for the settlement in question.

  The three fallback strategic site options are:

  - Expanded North St Albans – the assumption is that a cluster of four HELAA sites would be supported to the east of the railway line with a total area of 90 ha, such that the assumed capacity is 2,170 homes. However, in practice capacity could be lower, including due to problematic transport connectivity, and/or there could be some additional capacity to the west of the railway line, i.e. the sequentially preferable North St Albans strategic site option could feasibly be extended further to the north.
  - South East St Albans – the assumption is 880 homes across a 47 ha site between the A1081 London Road and Highfield Lane, leaving a landscape / Green Belt gap to the A414 of at least 400m.

[19] This might involve A) supporting HGC in a reduced form; B) supporting some but not all of the package of sites comprising land parcels 'recommended' for further consideration by the Green Belt; and/or C) supporting some but not all of the four strategic urban extensions proposed for allocation despite including land *not* 'recommended' by the Green Belt Review.
[20] See https://www.aylesburyvaledc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf

– North East London Colney – the assumption is 480 homes. The site is notably adjacent to the District's boundary with Hertsmere Borough, plus there is a need to consider the proximity of a major new settlement option that is being closely considered through the Hertsmere Local Plan, namely Bowmans Cross. Road and active travel accessibility is a clear challenge, but there is currently a junction onto the A414, which could feasibly be upgraded. In this respect, there could feasibly be some benefit to bringing forward development here in-combination with 'South East St Albans'.

- Employment – the approach taken to meeting employment land needs is held constant across the growth scenarios. Specifically, under all scenarios the assumption is that there would be delivery of 55 ha of employment land at East Hemel Hempstead, in addition to 33.16 ha as part of the Government permitted SRFI. The effect would be an over-supply of employment land locally (see Box 5.2). However, this is appropriate, given the challenges faced by other South West Herts authorities in respect of meeting need. East of Hemel Hempstead performs very strongly as a location for strategic employment growth and there is no reason to test scenarios without delivery of the Government permitted SRFI.
- Maps – please note that the four maps of growth scenarios show only proposed Green Belt allocations.

Table 5.2: *The RA growth scenarios (with Green Belt supply broken down by sub-area)*

Supply components			Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
Commitments			1,378	1,378	1,378	1,378
Windfall			2,880	2,880	2,880	2,880
Allocations	Urban supply		920	920	920	920
	Green Belt release	NE Hemel Hempstead	740	**4,750**	740	**4,750**
		St Albans	809	144	**5,377**	2,326
		Harpenden	963	-	1,561	1,561
		London Colney	-	--	**885**	405
		Redbourn	661	-	661	661
		Wheathampstead	213	-	213	213
		Bricket Wood	132	-	132	132
		Chiswell Green + HW + PS / Frogmore	438	-	438	438
		Edge of Radlett	274	-	274	274
Total homes			**9,407**	**10,072**	**15,459**	**15,938**
% above/below LHN (15,096)*			**-38**	**-33**	**2**	**6**
Housing requirement**			**~9,000**	**~9,000**	**LHN?**	**LHN**
Unmet need			**~6,000**	**~6,000**	**0?**	**0**

* 15,096 is local housing need (LHN) for the plan period (888 dpa x 17 years)

** The housing requirement is the number of homes the Local Plan commits to delivering, for monitoring purposes, and mindful that failing to deliver the housing requirement can render a local plan out-of-date.

Table 5.3: *The RA growth scenarios (with Green Belt supply broken down by category of site)*

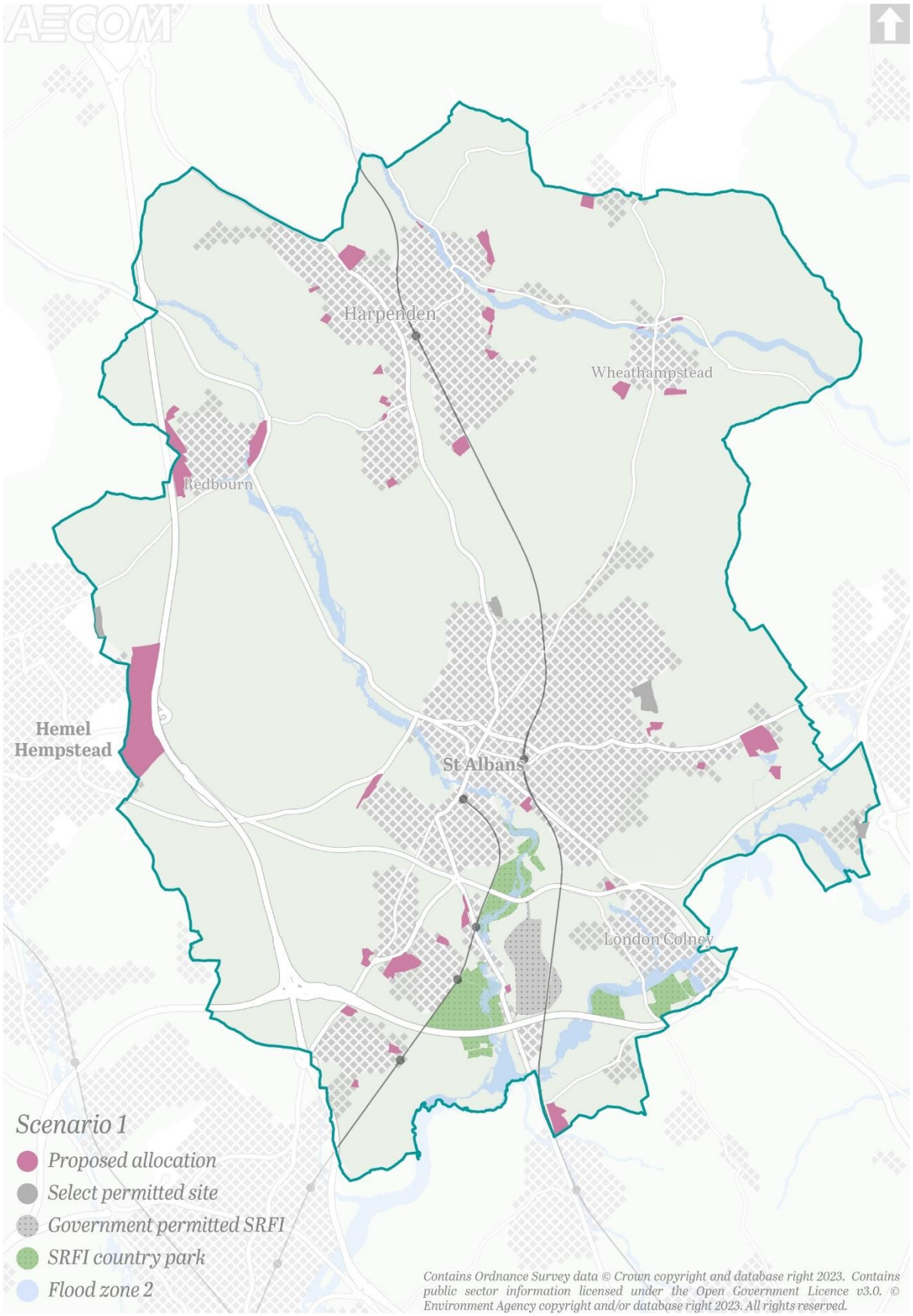
Supply components			Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
Commitments			1,378	1,378	1,378	1,378
Windfall			2880	2880	2880	2880
Allocations	Urban supply		920	920	920	920
	Green Belt release	Green Belt PDL	144	144	144	144
		Hemel Garden Communities (HGC)	740	**4,750**	740	**4,750**
		'Recommended' GB (non-HGC)*	3345		3182	3182
		North St Albans	-	-	996	996
		North East Harpenden	-	-	762	762
		East St Albans	-	-	522	522
		West London Colney	-	-	405	405
		Expanded North St Albans	-	-	**2170**	-
		South East St Albans	-	-	**880**	-
		NE London Colney	-	-	**480**	-
Total homes			**9,407**	**10,072**	**15,459**	**15,938**
% above/below LHN (15,096)**			**-38**	**-33**	**2**	**6**
Housing requirement***			**~9,000**	**~9,000**	**LHN?**	**LHN**
Unmet need			**~6,000**	**~6,000**	**0?**	**0**

* Higher under Scenario 1 because it includes 164 homes within NE Harpenden

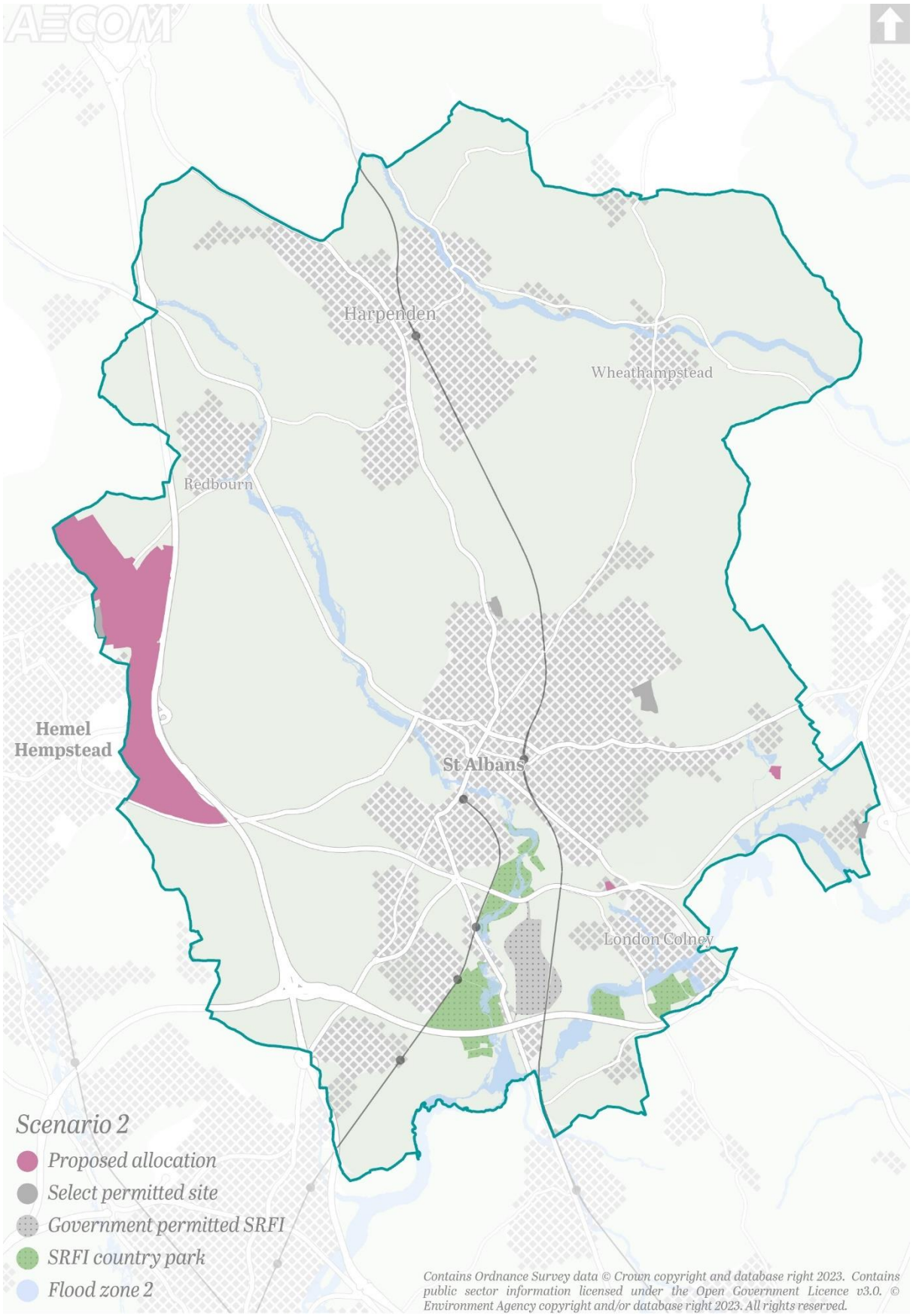
** 15,096 is local housing need (LHN) for the plan period (888 dpa x 17 years)

*** The housing requirement is the number of homes the Local Plan commits to delivering, for monitoring purposes, and mindful that failing to deliver the housing requirement can render a local plan out-of-date.

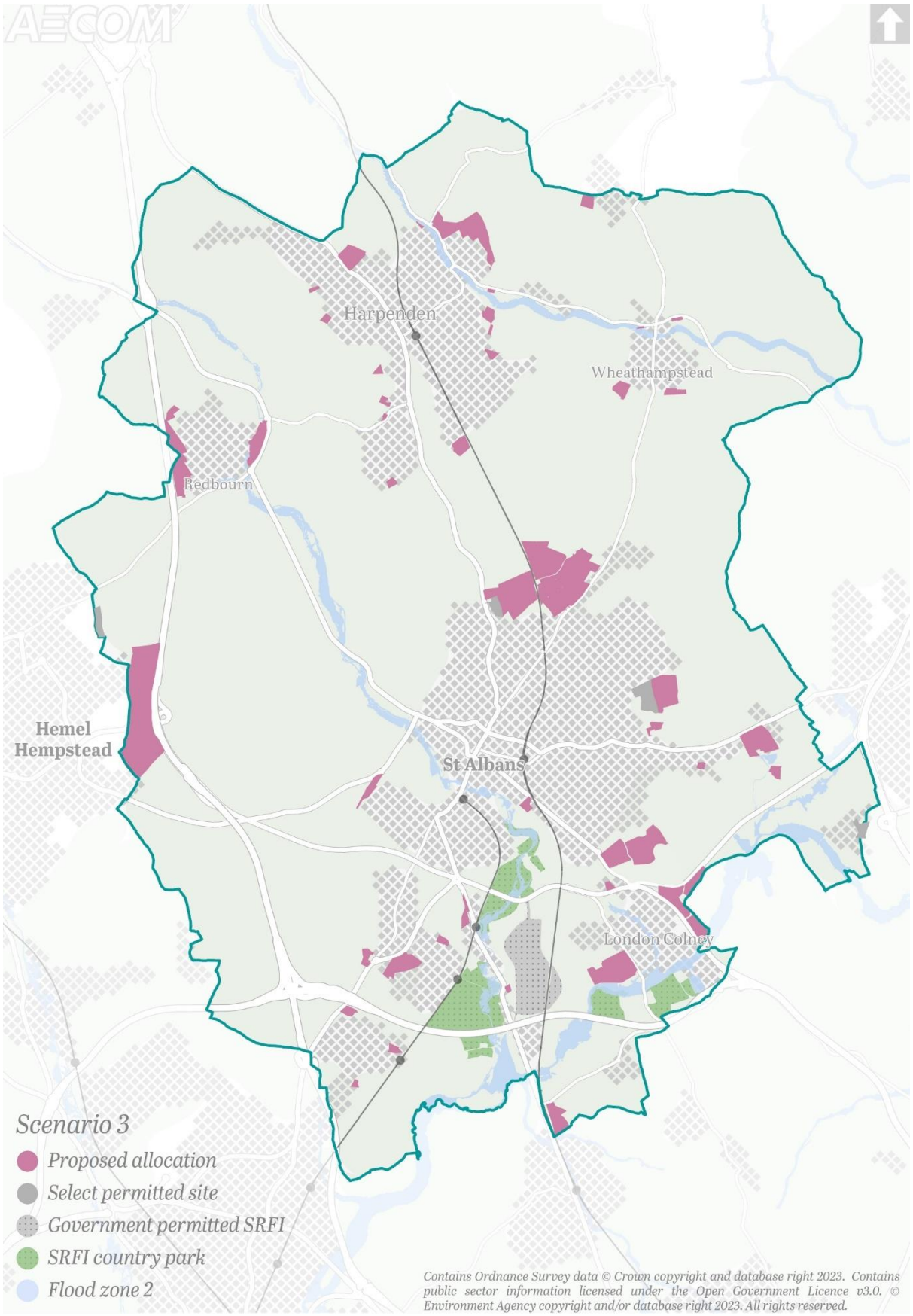
***Reasonable growth scenario 1**: Low growth; No HGC*



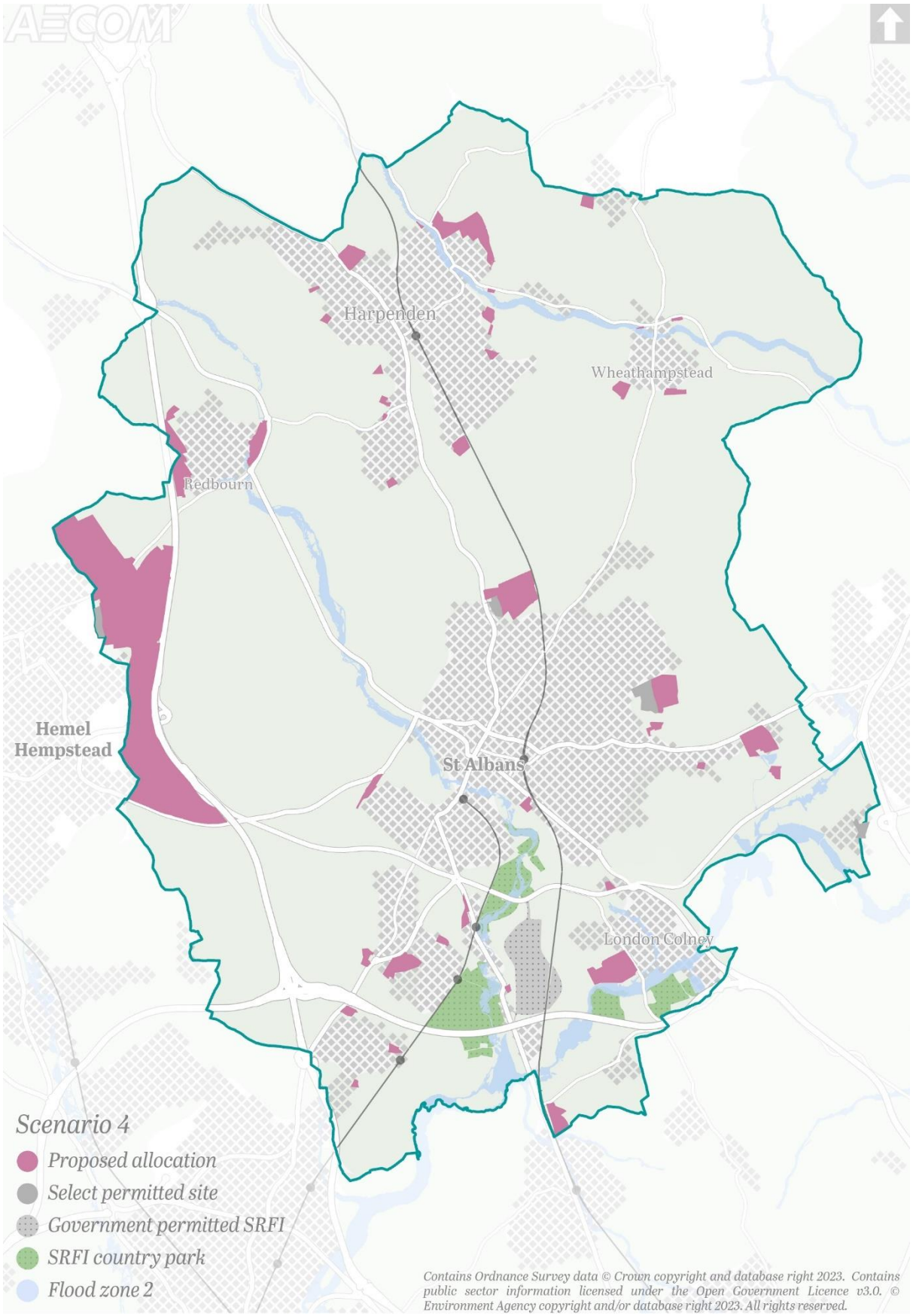
***Reasonable growth scenario 2**: Low growth; with HGC*



***Reasonable growth scenario 3**: Provide for LHN; no HGC*



***Reasonable growth scenario 4**: Provide for LHN; with HGC*



6 Growth scenarios appraisal

6.1 Introduction

6.1.1 Having defined reasonable alternatives in the form of four growth scenarios, the next step is to present an appraisal under the 'SA framework' (see Section 3).

Appraisal methodology

6.1.2 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix.

6.1.3 Under each heading, the aim is to:

1) rank the scenarios in order of performance (with a star indicating best performing); and then

2) categorise the performance in terms of 'significant effects' using red / amber / light green / green.[21]

6.1.4 Finally, it is important to be clear that there is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.

6.2 Appraisal findings

6.2.1 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix.

N.B. a key point to note is in respect of **growth quantum**. It is not considered appropriate to simply conclude a preference for lower growth from wide-ranging environmental perspectives, despite the fact that housing growth inevitably leads to environmental impacts. This reflects an assumption that unmet need would have to be provided for elsewhere within a constrained sub-region, and it is not always possible to conclude that St Albans is particularly constrained in the sub-regional context.

Accessibility (to community infrastructure)

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
2	2	2	1

6.2.2 There is strong support for **Scenario 4** relative to the alternatives, as growth would be distributed in line with the settlement hierarchy, and there would be a strong focus on directing growth in such a way that opportunities to deliver new and upgraded community infrastructure alongside new housing are realised.

6.2.3 Having made this initial point, the following bullet points consider the scenarios in turn:

- **Scenario 1** – the HGC opportunity would not be realised, nor would opportunities to deliver targeted new and upgraded community infrastructure (including four primary schools, two secondary schools and improvements to Oaklands College) through strategic urban extensions (involving land not 'recommended' by the GB Review) to St Albans, Harpenden, and London Colney.

  Certain 'accessibility' benefits would still be realised through strategic urban extension options supported under this scenario (i.e. those involving land 'recommended' by the GB Review), including benefits to existing residents, e.g. at Redbourn, where both extensions could deliver benefits. However, in some instances benefits are of limited significance or somewhat uncertain. For example, there is uncertainty in respect of new primary schools west of Redbourn and at Glinwell (east of St Albans).

[21] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

Finally, as a low growth scenario, the effect would be to export the challenge – in respect of delivering new and upgraded infrastructure alongside housing – to neighbouring authorities in the sub-region, and there is no reason to suggest that neighbouring authorities are any better placed to rise to the challenge.

- **Scenario 2** – the St Albans components of HGC would likely deliver a new secondary school, two large (3FE) primary schools and a range of other community, transport and green infrastructure, plus the effect would be to enable the Dacorum components of HGC to come forward, again with opportunities realised to deliver new/upgraded infrastructure alongside housing. HGC issues and opportunities clearly warrant further detailed scrutiny, but there is confidence that the 'accessibility' benefits of a strategy including a focus at HGC far outweigh the benefits of alternatives involving a much higher degree of dispersal.

  Elsewhere around the District opportunities to deliver targeted new and upgraded infrastructure to the benefit of existing communities (as discussed under Scenario 1) would be missed. Furthermore, there is a need to consider whether there are instances of settlements (particularly villages) requiring housing growth in order to maintain the viability of local services, facilities and retail, and the vitality of local centres. No particular issues are known to exist in this regard, but this is increasingly seen as an issue nationally, for example with increasing instances of declining rolls at rural primary schools.

  However, on the other hand, this is the only scenario that would *not* involve a considerable focus on new homes via piecemeal urban extensions that would deliver relatively little in the way of community infrastructure alongside housing. Harpenden potentially stands out in this regard, with Scenario 1 involving 670 new homes across smaller sites (NW Harpenden would deliver some new community infrastructure, as well as cycle connectivity improvements), but certain other sub-areas would also see growth that could be described as somewhat piecemeal under all scenarios other than Scenario 2.

- **Scenario 3** – would involve two strategic urban extensions where there appears to be relatively little in the way of an 'accessibility' opportunity relative to HGC. In particular, at North East London Colney and South East St Albans, there might well be limited call for a new secondary school, assuming new secondary schools as part of the East St Albans and West London Colney strategic urban extensions that would also feature under this scenario, as well as under Scenario 4. Having said this, growth in this area would be supportive of A414 / HERT objectives and could potentially support delivery of a large-scale new settlement at Bowmans Cross, plus a strategic urban extension at South East St Albans would be quite well connected to the town centre and train station. With regards to North St Albans, this scale of growth would likely be sufficient to enable delivery of a new secondary school.

- **Scenario 4** – would involve HGC (discussed above), the package of strategic and smaller urban extensions discussed above under Scenario 2 and four further strategic urban extensions (North East Harpenden, North St Albans, East St Albans, West London Colney) that all perform well in terms of community infrastructure 'accessibility' objectives. In particular, East St Albans and West London Colney would deliver new secondary schools. Also, North East Harpenden would be very well connected to a recently delivered secondary school. All would deliver new primary schools, albeit these would be 2-form entry schools, as opposed to the 3-form entry schools that could be delivered at HGC.

  N.B. another key consideration is the potential to deliver new strategic walking and cycling infrastructure, in line with the priorities set out within the St Albans Local Cycling and Walking Implementation Plan (LCWIP). This matter is a focus of discussion below under the 'Transport' heading.

6.2.4 In **conclusion**, there is a clear preference for Scenario 4, but it is not possible to confidently differentiate between the other three scenarios.

6.2.5 With regards to significant effects, there is confidence in highlighting Scenario 4 as performing very well, as an approach to growth that would secure new and upgraded infrastructure, to the benefit of new and existing communities, alongside new housing. However, there is a need for further work to understand more precisely what can be achieved (including drawing on consultation responses from the County Council and other key stakeholder organisations). With regards to the other scenarios, there is an argument for suggesting that they could lead to a negative effect on the baseline situation. However, it is not clear that this would be the case, mindful that the baseline situation would likely involve piecemeal housing growth coming forward (likely to include 'planning by appeal') without strategic consideration given to infrastructure issues / opportunities.

Air and wider environmental quality

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
2	2	2	1

6.2.6 A key consideration here is the matter of total **growth quantum**, with there being a clear transport and, in turn, air quality argument for meeting housing needs close to source (to minimise commuting). Furthermore, early commitment to providing for LHN, as opposed to protracted consideration of lower growth scenarios / unmet need, is conducive to early and effective strategic transport planning. It is recognised that St Albans is subject to a degree of air quality constraint, particularly noting the air quality management area (AQMA) affecting St Albans High Street. However, looking across the sub-region (see Appendix II), it is evident that local authorities closer to London are subject to higher constraint.

6.2.7 With regards to the distribution of growth, considerations include:

- **Scenario 1** – a number of the proposed urban extensions are beyond easy walking distance of a town / village centre and/or distant from bus corridors, plus several are in need of further work to confirm accessibility arranges and, in turn, the potential to support a modal shift to travel by active modes. Allocation options at the southern edge of Harpenden potentially stand-out in this regard, as does the proposed allocation at Gustard Wood, north of Wheathampstead, where there are no facilities.
- **Scenario 2** – there are two air quality management areas (AQMAs) at Hemel Hempstead, but these are relatively distant from HGC (associated with north-south road corridors close to the western edge of the town). HGC is considered to be associated with a considerable opportunity in respect of masterplanning in support of trip internalisation and modal shift away from the private car (albeit there is a need for further work), plus the A414 strategy / HERT represents a considerable opportunity to address air quality hotspots across the sub-region (for example, there is an extensive AQMA affecting Hertford). However, benefits would be felt in the long term, and air quality concerns are decreasing over time due to the shift away from internal combustion engine vehicles (albeit concerns will remain, particularly in respect of particulates from roads, brakes and tiers, including mindful of the weight of electric vehicles).
- **Scenario 3** – an expanded north of St Albans urban extension (relative to scheme supported under Scenario 4) would be very challenging in terms of transport connectivity, as the site is poorly related to the strategic road network, with a likely need for primary access via the B651, which is not suited to being upgraded for cycle or bus connectivity. Also, whilst a large-scale strategic urban extension would lead to a considerable opportunity for trip internalisation in theory, in practice the train line would be a major barrier to movement. With regards to NE London Colney, an immediate consideration is air and noise pollution from adjacent dual carriageways and also dual carriageways acting as a barrier to active travel. However, a South East St Albans urban extension would be well-located in transport terms, and a focus of growth in proximity to the A414 could well be supportive transformational change, e.g. HERT.
- **Scenario 4** – in addition to HGC, this scenario would see four urban extensions over-and-above those that feature under Scenario 1, namely North East Harpenden, North St Albans, East St Albans and West London Colney. The two St Albans sites are beyond easy walking distance of the town centre and train station, but both are located on good bus routes (the two key routes through the town) and there are opportunities for strategic upgrades to cycling infrastructure. West of London Colney is in good proximity to the local centre and schools, plus delivering a new secondary school will help to reduce the distance that students need to travel to school and, in turn, help with peak time traffic congestion. A benefit of North East Harpenden is its proximity to a recently delivered secondary school, although school traffic in combination with traffic relating to housing growth is a matter for further consideration.

  N.B. further discussion of transport issues / opportunities is presented below under 'Transport'.

6.2.8 In **conclusion**, there is a clear preference Scenario 4, but it is not possible to confidently differentiate between the other three scenarios. With regards to significant effects, broadly neutral effects are predicted on balance. There is an argument for suggesting positive effects on the baseline under Scenario 4; however, on the other hand, benefits resulting from new infrastructure delivery will be felt in the long-term and the baseline situation is set to improve significantly over time.

Biodiversity

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
2	1	1	1

6.2.9 A primary concern here is in respect of the package of non-strategic site options that feature in **Scenarios 1, 3 and 4**. Numerous intersect priority habitat, sometimes to a significant extent and/or are adjacent to a designated local wildlife site (LWS), as discussed further in Appendices V and VI. The likely need for loss of some historic hedgerow can also be envisaged for several sites, although a degree of loss is unavoidable in the context of the Local Plan. Assumed yields have been defined to reflect onsite constraints; however, in several instances, there is a need for further work / evidence to demonstrate that an appropriate balance is being struck between making best use of the site for housing delivery and infrastructure versus leaving parts of sites undeveloped as greenspace in order to mitigate biodiversity concerns. It is recognised that there is a legal requirement for biodiversity net gain, but there is nonetheless a need to avoid impacts to biodiversity in the first instance, as far as possible, ahead of relying on mitigation and compensation. Also, whilst there is no certainty, allocation of numerous sites that struggle to achieve credits onsite could create a challenge in respect of finding sufficient land, in suitable locations, to achieve offsite biodiversity credits and, in turn, sufficient biodiversity net gain.

6.2.10 To reiterate, biodiversity constraint is a focus of the discussion of site options presented in Appendix VI; however, one point to note here is the possibility of in-combination effects at Bricket Wood, where all three proposed allocations are subject to a degree of constraint, most notably a small site very close to a SSSI.

6.2.11 With regards to HGC (**Scenarios 2 and 4**), there is a headline constraint in the form of recreational pressure on Ashridge Woods and Commons SSSI component of Chilterns Beechwoods SAC. However, there is confidence in the ability to suitably mitigate concerns through delivery of extensive and high quality new Strategic Alternative Natural Greenspace (SANG). Furthermore, there is a need to recognise that without the St Albans component of HGC the Dacorum component could well prove undeliverable, leading to greatly increased pressure for growth elsewhere in Dacorum, including at constrained locations (both Berkhamsted and Tring are constrained, both by proximity to Ashridge and more widely) and at smaller sites less well-suited to delivering strategic SANG. Finally, it is important to recognise that HGC is notably unconstrained by onsite, adjacent or nearby biodiversity designations or priority habitat. It also appears likely that the area is not particularly sensitive in terms of historic field boundaries, although there is some variability across the site, e.g. there appears to be a concentration of more significant field boundaries (which are shown on the pre-1914 OS map) to the east of Cherry Tree Lane (also to the west).

6.2.12 With regards to strategic urban extension options (**Scenarios 1, 3 and 4**), these mostly give rise to limited biodiversity concerns, and as strategic sites there would be good potential to design-in high quality green and blue infrastructure. Considerations include:

- North of St Albans – the southern extent (either side of the railway line) is notably constrained by a cluster of priority habitat linear woodlands, including 'Long Spring', which comprises ancient woodland and is associated with a public footpath. On the other hand, growth here would be in close proximity to Heartwood Forest, which is a 'positive' from a biodiversity perspective. There would be good potential to deliver enhancements, particularly under Scenario 3 (which would see a much larger scheme).
- Burston Nurseries, North Orbital, How Wood – would primarily involve previously developed land (in use as for horticulture) and the site also has clear merit in that How Green local centre is nearby. However, significant priority habitat is adjacent including two LWS. The area was historically associated with the Burston Manor and a series of woodlands, with considerable woodland having already been lost.
- Glinwell, east of St Albans – as a brownfield site there are inherently limited concerns; however, the western ~1/4 of the site is greenfield and closely associated with Butterwick Brook. It will be important to consider delivering green/blue infrastructure in this area, including mindful of nearby priority habitat.
- North East London Colney – existing areas of woodland would create a challenge for masterplanning, most notably Coppice Wood, which is quite a large ancient woodland. However, there could feasibly be quite a significant opportunity in respect biodiversity and accessibility enhancements to Bowmans Lake

and the extensive areas of associated woodlands, potentially in conjunction with a large new settlement at Bowman's Cross (Hertsmere). The lakes complex is currently used for angling, such that there is presumably limited accessibility, although there is a high density of public rights of way in the area.

- East St Albans – land between St Albans and Hatfield is associated with quite a high density of woodland patches, and the majority are not publicly accessible. However, the proposed site does not appear to give rise to any particular issues or opportunities.
- North of Radlett – gives rise to limited concerns, including as much of the site comprises brownfield land. There is a notably woodland complex to the east, including a large ancient woodland, which appears to be inaccessible to the public, hence growth in this area could feasibly support improved accessibility.
- North East Harpenden – there is a modest cluster of common land and associated priority habitat on raised land a short distance to the northeast of the site, which could potentially be a focus of biodiversity and accessibility enhancements.
- South East St Albans – there are several mature, historic field boundaries, including along Nightingale Lane, which links woodland patches to the north and to the south.

6.2.13 Finally, with regards to **growth quantum**, it is not considered appropriate to simply conclude a preference for lower growth from a biodiversity perspective. This is because unmet need would presumably have to be provided for elsewhere within a constrained sub-region, and it is not possible to conclude that St Albans is particularly constrained in the sub-regional context, in respect of biodiversity.

6.2.14 In **conclusion**, whilst there is an argument for supporting Scenario 2, as the only scenario without reliance on challenging non-strategic urban extensions, as a low growth scenario there could biodiversity challenges sub-regionally. In turn, and on balance, it is considered appropriate to only flag Scenario 1 as performing poorly, as a low growth scenario with reliance on challenging non-strategic urban extensions and with opportunities missed at strategic growth locations.

6.2.15 With regards to significant effects, broadly neutral effects are predicted. There is a case for predicting positive effects under the better performing scenarios, given biodiversity net gain requirements and certain site-specific opportunities, but these scenarios all have clear drawbacks (low growth in the case of Scenario 2 and a package of challenging non-strategic urban extensions under Scenarios 3 and 4).

Climate change adaptation

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
2	1	1	1

6.2.16 The key consideration here is the need to avoid development - in particular new homes - encroaching on fluvial flood risk zones, noting the possibility of expanded flood risk zones under climate change scenarios. A secondary consideration is surface water flood risk, noting that it is often possible to deal effectively with surface water flood risk through masterplanning and sustainable drainage systems (SuDS). Another consideration is development impacting on water flows and, in turn, down-hill or down-stream flood risk; however, it is difficult to pinpoint issues ahead of detailed work, and it is typically the case that SuDS can be implemented to ensure no net worsening of run-off rates, and often a betterment.

6.2.17 A number of the sites that are 'recommended for further consideration by the Green Belt Review' (**Scenarios 1, 3 and 4**) significantly intersect a flood risk zone, whether that be a fluvial flood zone or a higher risk surface water zone (where 1 in 30 year is a higher risk zone). Whilst there will be ample opportunity to masterplan sites, and potentially reduce site yields, in order to avoid and buffer flood zones and design-in sustainable drainage systems (SuDS), there is a need to take a sequential approach to avoiding flood risk, whereby issues are avoided in the first instance as far as possible.

6.2.18 Site options giving rise to a degree of concern include:

- East of Redbourn – the current assumed capacity is ~58 homes, but this will need to be kept under review, in discussion with the Environment Agency, given the extent of onsite fluvial flood risk associated

with the River Ver, and accounting for the potential to ensure safe site access and egress in the event of a flood. It is noted that a specific aim is to deliver enhancements to the river corridor.

- Highway Chipping Depot, Lower Luton Road, Wheathampstead – is a small site that partly intersects the fluvial flood zone associated with the River Lee, with a residential area at risk downstream.
- Sewage Treatment Works, Piggottshill Lane, Harpenden – intersects a surface water flood zone to a significant extent, but this is primarily the lowest risk (1 in 1,000 year) zone.
- Tippendell Lane and Orchard Drive, How Wood – a strong surface water flood channel runs along the road at the southern edge of the site.
- North West Harpenden – similarly, a strong surface water flood channel runs along the adjacent A1081 (associated with a dry valley), with the town centre downstream.

6.2.19 With regards to the strategic urban extension options that only feature in **Scenarios 3 and 4** (i.e. urban extensions including land not 'recommended' by the GB Review), most are quite unconstrained in flood risk terms. With regards to the option of strategic growth at North East London Colney (Scenario 3), there could feasibly be the potential to deliver flood water attenuation along the River Colne corridor, to the benefit of a downstream residential area in London Colney that is currently affected by flood risk.

6.2.20 Finally, HGC (**Scenarios 2 and 4**) is primarily associated with raised land between the rivers Ver and Gade and, in turn, is associated with limited flood risk, plus as a large strategic site it is fair to assume high quality sustainable drainage as part of masterplanning and urban design. Three surface water flood channels pass west to east through the area (with water flowing towards the Ver), which, it is fair to assume, would be effectively integrated as part of a green / blue infrastructure strategy.

6.2.21 In **conclusion**, there is an argument for supporting Scenario 2, as the only scenario without reliance on certain challenging urban extensions. However, the proportion of the supply under the other three scenarios (particularly Scenarios 3 and 4) subject to a degree of flood risk is not high. As such, and on balance, it is considered appropriate to only flag Scenario 1 as performing poorly, as a low growth scenario (such that unmet needs are exported elsewhere, feasibly leading to pressure to deliver new homes in areas where flood risk is an issue, including potentially within urban areas) with the opportunity missed to allocate a number of strategic sites subject to low flood risk.

6.2.22 With regards to significant effects, at this early stage it is appropriate to flag a 'moderate or uncertain negative effect' under all scenarios, ahead of further work and consultation with the Environment Agency.

Climate change mitigation

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
3	2	2	1

6.2.23 The discussion here focuses on per capita greenhouse gas emissions from the **built environment**, mindful that alignment of the reasonable alternative growth scenarios with strategic transport objectives is a focus of discussion under other topic headings. In particular, a focus of discussion here is in respect of the potential for each of the scenarios to support a focus on strategic growth locations and to support higher density mixed use communities, with a view to minimising built environment emissions.

6.2.24 In this light, there is clear support for **Scenario 4**. This is primarily because HGC is considered likely to represent a considerable built environment decarbonisation opportunity (plus there are transport decarbonisation opportunities). Additionally, there could potentially be a degree of built environment decarbonisation opportunity at one or more of the other strategic urban extension options that feature.

6.2.25 The opportunity will primarily relate to achieving standards of **operational emissions** beyond the standards required through Building Regulations ('regulated operational emissions'), and ideally 'onsite net zero' (i.e. net zero emissions without resorting to offsetting). Specific opportunities can relate to: high efficiency standards leading to low demand for heating and cooling (i.e. in line with a 'fabric first' approach to built environment decarbonisation); onsite renewable power generation, which typically means rooftop

solar PV (there is a particular opportunity at HGC);[22] battery storage to make the most effective use of solar PV and ensure local grid capacity for electric heating (heat pumps) and vehicles; and potentially heat networks, which can significantly boost the efficiency of heat pumps, but are challenging to deliver, and typically require high density mixed use development (also a source of ambient or waste heat). There could also be an opportunity to plan for the use of hydrogen for heating (and/or transport), but the role of hydrogen as part of the future energy mix (versus electricity) is currently unclear (see Appendix III).

6.2.26 However, there could well also be an opportunity to minimise **non-operational emissions**, which primarily translates as the embodied carbon in construction materials and the emissions associated with construction and demolition (also upkeep and necessary changes to a building over its lifetime, e.g. retrofitting for a new use). One key means of minimising non-operational emissions is support for modern methods of construction, which is broad concept, but one which invariably includes a focus on realising opportunities for offsite modular construction. The Hertfordshire Growth Board is seeking to place the County at the forefront of "offsite manufacture" practice nationally, building on Hertfordshire's heritage as a "cradle for continuous experiment in the making of cities" and recognising that Hertfordshire is home to the BRE. It could well be the case that allocation of strategic growth locations within St Albans, to include HGC and in combination with strategic growth locations elsewhere in the sub-region (including Harlow and Gilston Garden Town), helps with building a business case for a sub-regional MMC facility.

6.2.27 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong **viability**, with a view to ensuring funding for decarbonisation measures (recognising that there are inevitably competing funding priorities, including affordable housing and infrastructure). This serves as an argument for providing for LHN in St Albans (Scenarios 3 and 4). However, there is otherwise limited potential to differentiate between the scenarios, recognising that viability is high across the District. One consideration is that the strategic urban extension options that would replace HGC under Scenario 3 are something of an unknown entity in respect of the costs of necessary infrastructure, and there is reason to suggest that costs could be high. Another consideration is the cost of delivering the Chilterns Beechwoods SAC mitigation strategy in the west of the District.

6.2.28 Another consideration is that certain of the sites are associated with onsite uses and/or access constraints that could feasibly lead to abnormal development costs, which could then potentially have implications for development viability and the funds available for decarbonisation focused measures. A site that potentially stands out, in this respect, is Harpenden Sewage Treatment works. The site is well-located in terms of walking access to the town centre and train station but dealing with onsite contamination will likely be a challenge and access also appears challenging, given current access via a narrow lane.

6.2.29 In **conclusion**, there is clear support for Scenario 4, as a focus of growth at strategic sites leads to a built environment decarbonisation opportunity. Furthermore, Scenario 3 would involve meeting LHN in full, as opposed to exporting unmet housing need to neighbouring areas, where the potential to deliver homes in line with decarbonisation objectives is an unknown.

6.2.30 With regards to significant effects, whilst all scenarios could well see an improvement on the baseline (a situation whereby growth continues to come forward but in a less well-planned way), there is a need to reach conclusions mindful of established objectives and targets, including the local 2030 net zero target.

6.2.31 There is a high bar to reach before predicting positive effects of any significance, given the urgency of the issue, i.e. the decarbonisation trajectory required if national and local net zero target dates are to be met. It is hoped that it will be possible to predict significant positive effects at the next stage (Regulation 19); however, at this current stage (Regulation 18) there is insufficient evidence of built environment decarbonisation being integrated as a key factor with a bearing on spatial strategy and site selection. HGC does clearly represent an opportunity, but scheme-specific information available at the current time is high level. There is a need for further work, including by site promoters to demonstrate the extent to which there is a particular site or concept-specific decarbonisation opportunity.

6.2.32 For these reasons it is not possible to predict positive effects of any significance for Scenario 4. With regards to Scenarios 2 and 4, it is judged appropriate to predict 'moderate or uncertain negative effects'. To reiterate, this is not to say that there would necessarily be a negative effect on the decarbonisation baseline, but rather to highlight that any positive effect on the baseline would fall short of what is required.

[22] There is an established opportunity to deliver extensive rooftop solar as part of the strategic employment scheme at HGC. However, there is a need to consider whether the electricity would feed the local area or the national grid. If the latter, then there is a need temper understanding of the benefits, because the solar capacity could be delivered elsewhere to the same effect.

Communities and health

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
1	1	2	1

6.2.33 The aim here is to discuss factors other than in respect of 'Accessibility'. Key considerations include:

- **Place-making, high quality design and beauty** – growth at scale can, in theory, lead to an opportunity, particularly if delivered in line with garden community principles, as is the intention for HGC. However, it is recognised that opportunities can often be missed in practice. It is difficult to comment further at this stage, in respect of the varying merits of site options, and it is anticipated that further account will be taken of scheme proposals submitted by site promoters at the next stage of work (Regulation 19).

  Focusing on HGC, a considerable amount of work has been completed to date to demonstrate the ability to bring forward a scheme that fully aligns with garden community principles, including in respect of supporting good health via green infrastructure, active travel infrastructure, sports / recreation facilities and a mix of uses in support of walkable communities, to include extensive employment land. The intention is also to support the regeneration of the town centre, including via an extended Nickey Line.

- **Neighbouring uses** – an issue in constrained areas can be pressure to direct new homes to locations adjacent to main roads and railways where there is degree of air and noise pollution. West of Redbourn does stand-out as a site very closely related to the M1, plus this also applies to HGC, albeit at HGC there will certainly be ample opportunity to avoid and mitigate noise pollution through masterplanning, landscape, design and earth bunds or other noise mitigation. Noise pollution is typically reflected in house prices, but there can be impacts not reflected accounted for by the market.

  Other sites of note are: North of Oakwood Road, Bricket Wood, is close to M25 J21a, but it is noted that there is an existing earth bund between the site and the junction; Harper Lane, north of Radlett, is adjacent to the train line to London, but it is noted that the track is in a cutting and there is existing mature track-side vegetation; Sewage Treatment Works, Harpenden, is adjacent to another treatment works that would remain operational, with associated odour; West of Rothamsted Research, Harpenden Campus, is strongly associated with an employment area; and North East London Colney (which only features under Scenario 3) would be constrained by two adjacent dual carriageways.

- **Green and blue infrastructure** – to reiterate points made above, a number of the sites are associated with a clear opportunity, and strategic sites can tend to give rise to a particular opportunity. East of Redbourn stands out as a smaller site associated with a particular green/blue infrastructure opportunity.

  Another key site of note is West London Colney, which is adjacent to Napsbury Park (to the north) and the River Colne (to the south), where the Government permitted SRFI is set to deliver a county park.

- **Access to the countryside** – the District is broadly well served by a network of public rights of way linking settlements to high quality countryside, including river corridors, woodlands, common land and attractive rural settlements, with key assets including the Heartwood Forest, the Ver-Colne Valley Walk and commons closely integrated with settlements (most notably Harpenden, Redbourn and Bricket Wood), plus there is a need to factor-in the series of county parks set to be delivered alongside the Government-permitted SRFI in the south of the District. However, there is some variability, in terms of access to the countryside, such that growth-related opportunities might be explored. For example, there are woodlands / woodland complexes where improved accessibility might be sought, and a continuous route might be sought along the River Lee between Harpenden and Wheathampstead.

- **Active travel** – this is a focus of discussion under other headings, but also warrants mention here, as access to active travel infrastructure (linking to key destinations) is important for good health, and new / upgraded infrastructure is a key means of achieving 'planning gain' to the benefit of existing community. The District has a very good existing network, including cycle routes along two former train lines, and this network has been a key factor influencing site selection. HGC and East of Redbourn are located on the Nickey Line, and Glinwells (east of St Albans) is also located on an offroad cycle route. Other strategic urban extensions with the potential to deliver upgrades to cycle infrastructure are: North West Harpenden, North of St Albans and North of Radlett.

- **Traffic congestion** – directing growth in order to minimise traffic congestion is often a key issue for existing communities. Detailed traffic modelling has not been completed to date, but it fair to highlight HGC, London Colney and Redbourn as being well-connected to the strategic road network, as well as the collection of villages in the south of the District, although this area is set to experience an increase in HGV traffic as a result of the Government permitted SRFI. However, connectivity to the strategic road network is far from the only consideration, as there is a need to consider trip destinations, for example residents of Redbourn typically attend secondary school in Harpenden, and it is noted that the new secondary school at Harpenden is located at the eastern extent of the town. Harpenden is subject to some inherent traffic issues, given links to the strategic road network and also challenges created by two railway / former railway corridors and a river corridor passing through the urban area. There is a need to consider the cumulative effects of growth locations, and also be mindful of rural rat-running.

  Road safety is a related issue, and it is noted that: several small site options would achieve access via rural lanes; a small site option at Frogmore would involve access on a bend in the A5183; and North of Radlett is associated with the challenging Watling Street / Harper Lane junction (an accident hotspot).

- **Green Belt** – warrants mention here as an issue that can clearly generate a high degree of interest / concern amongst local residents. The contribution of land to the defined purposes of the Green Belt has been a major factor influencing the progression of sites to the reasonable growth scenarios. However, HGC is mostly not 'recommended' by the GB Review, and this is also the case for the strategic urban extension options that feature only in Scenarios 3 and 4 (i.e. they are not 'recommended' in whole or in part). The option of a very large urban extension at North St Albans under Scenario 3 potentially stands-out, from a communities perspective, in that it would involve transformational change to the area.

- **Village vitality** – as discussed in Appendix VI, a number of settlements are associated with low recent and committed growth, for example Redbourn. There are not known to be any particular issues locally, but in general: a lack of new housing can contribute to an ageing population and suppressed household formation; the national trend towards online retail is putting strain on local and neighbourhood centres; and rural primary schools can struggle to maintain school rolls, due to a recent period of low birth rates.

- **Relative deprivation** – this is more of a cross-border issue (see Figure 2.3, above; also the discussion of relative deprivation in neighbouring areas presented in Appendix II). It is important to recognise the potential for HGC to support regeneration objectives for Hemel Hempstead as a whole, and also a need to be mindful of objectives around addressing pockets of relative deprivation in Hertsmere Borough.

- **Gypsies and Travellers** – meeting accommodation needs is a focus of discussion below, under 'Housing', but another consideration is development encroaching on the existing sites at Redbourn and Park Street (under Scenarios 1, 3 and 4). This is not necessarily a problem, but is something to be carefully considered, e.g. through masterplanning and when considering access arrangements. In particular, the East of Redbourn site option is very closely associated with a Gypsy and Traveller site.

6.2.34 In **conclusion**, there are wide-ranging factors, such that it is very difficult to differentiate between the growth scenarios with confidence. It is recognised that there may be concerns amongst some members of the local community regarding the negative impacts of housing growth; however, arguments for lower growth are in the context of an assumption that unmet need would have to be provided for elsewhere within a constrained sub-region. There is clear support for HGC, as a garden community and a scheme with a focus on achieving wide-ranging objectives for Hemel Hempstead, and the HGC programme is progressing relatively well outside of the St Albans Local Plan process. In contrast, the two strategic urban extension options that would replace HGC under Scenario 3 would undoubtedly be a difficult political 'sell', given constraints and less of a case to be made in respect of community benefits / planning.

6.2.35 With regards to significant effects, 'moderate or uncertain positive effects' are predicted for the better performing scenarios, albeit a number of sites feature that are associated with issues / impacts. In addition to support for HGC (Scenarios 2 and 4), the strong focus on alignment with the Green Belt Review is supported (Scenario 1 performs best), and the urban extensions that feature in both Scenarios 3 and 4 are all associated with clear potential to deliver planning gain. Focusing on the latter sites, it is noted that all four featured in the previous version of the St Albans Local Plan (withdrawn in 2020), and that North of St Albans has generated a degree of local opposition.

6.2.36 A final key consideration is simply the need to adopt a local plan in order to avoid development coming forward in a less well-planned manner, under the presumption in favour of sustainable development ('planning by appeal') or otherwise in a manner outside of local control (St Albans is at risk of Government intervention as the Local Plan is the second-oldest nationally, and will likely soon become the oldest).

Economy and employment

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
3	2	2	1

6.2.37 It is comparatively easy to confidently differentiate between the RA growth scenarios in respect of the potential to support objectives and employment and economic growth. There is clear support for:

- Setting the housing requirement at LHN (**Scenarios 3 and 4**) – St Albans is home to two of Hertfordshire's main research and innovation assets in the Building Research Establishment (BRE) and Rothamsted Research, and St Albans is a thriving location for office-based businesses. Despite these strengths, a high proportion of recent jobs growth (2019 figures) has been in low skilled and low value sectors, and there is a growing disconnect between the skills profile of residents and the number of good quality job opportunities locally. In this light, there is a need to provide for new homes suited to well-skilled workers wishing to work in the local area, as opposed to those wishing to commute to high salary employment in London. Also, there is a need to recognise that St Albans is very well-connected to other key employment areas sub-regionally, notably across Hertfordshire (see map here) but also at Luton.
- Supporting HGC in full (**Scenarios 2 and 4**) – whilst the assumption under Scenarios 1 and 4 is that the main employment component of HGC would be delivered, adjacent to M1 J8, in practice there is little confidence that this would prove achievable, for example given the need for costly road upgrades. Also, the lack of a local workforce would lead to high rates of in-commuting and associated traffic.

  Strategic expansion would support Hertfordshire IQ (a national Enterprise Zone) and support a regionally important cluster alongside Rothamsted Research and Building Research Establishment (BRE).

6.2.38 Under **Scenario 3** there is little reason to assume that an expanded North of St Albans urban extension would give rise to a significant opportunity to bring forward new strategic employment land. With regards to North London Colney and South East St Albans, these sites are in proximity to the strategic road network, but it can be envisaged that delivering significant new employment land would lead to challenges from a masterplanning and Green Belt / landscape sensitivity perspective. At North East London Colney the potential for road / junction upgrades to enable good access to the strategic road network is unclear. There is also the need to note the proximity of the Government-permitted SRFI, ~3km to the west.

6.2.39 Final considerations are:

- Rothamsted Research – the proposal is for allocation of small site for housing (~55 homes) adjacent to the west of Rothamsted Research under all scenarios other than Scenario 2. This is tentatively supported, from a perspective of wishing to support the vitality and viability of a key employment hub, although there is a need to question whether the land might alternatively be used for new employment land (now or in the future). In this respect, it is noted that the Green Belt Review does also 'recommend' another area of land that could potentially be considered in the future for new employment floorspace.
- Buildings Research Establishment – is a key employer in the south of the District. Scenario 2 would lead to an opportunity missed in respect of delivering several hundred homes within cycling distance.
- Existing employment land – Glinwell (East of St Albans) is a long-established glasshouse business growing salad vegetables across the sub-region; and North of Radlett comprises a light industrial area. These sites would be allocated under all scenarios other than Scenario 2. Also, assumed as a constant across all the scenarios is redevelopment of the Albert Bygrave Retail Park, north of London Colney.

6.2.40 In **conclusion**, there is a very strong preference for Scenario 4, with Scenario 1 performing poorly as a low growth scenario that would not deliver HGC in full.

6.2.41 With regards to significant effects, under all scenarios there would be an oversupply of employment land locally, as measured against the requirement assigned to St Albans by the South West Herts Economic Update (2019; N.B. an update is being prepared). However, this is appropriate given the potential for unmet need from Dacorum and potentially other South West Herts authorities. Also, it is appropriate recognising that East of Hemel Hempstead is a highly suitable location for new strategic employment land.

Historic environment

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
2	1	3	1

6.2.42 A number of the site options comprising land 'recommended for further consideration' by the Green Belt Review (**Scenarios 1, 3 and 4**) are constrained in historic environment terms.

6.2.43 Firstly, it should be noted that two sites intersect a conservation area, both of which are located at Hatching Green (for a total of 40 homes), and a further six sites are adjacent (including three at Harpenden).

6.2.44 The following bullet points consider select sites considered to be of particular note:

- Rothamsted Lodge, Hatching Green – is located within the Harpenden Conservation Area, and the buildings onsite appear on the pre-1914 OS map (associated with one of the entrances to Rothamsted). However, there is an adjacent existing permission for five bungalows (ref. 5/2022/1814).
- Amwell Top Field, Wheathampstead – access would be from Amwell Lane, which has a rural character and is likely to be a popular recreational route between Wheathampstead and the historic hamlet of Amwell, where there is a designated conservation area and a pub, as well as to Nomansland Common / Heartwood Forest. The field in question is clearly visible from Amwell Lane (depending on hedgerow height); however, the site is otherwise subject to limited constraint, and the proposal is to develop only the northern part of the site that relates most closely to Wheathampstead / is most distant from Amwell.
- West of Rothamsted Research, Harpenden Campus – will likely have a degree of impact on the setting of Grade 1 listed Rothamsted, given the public rights of way in the area, including an adjacent footpath that follows a historic tree-lined 'avenue linking Rothamsted to Harpenden.
- Cross Lane, Harpenden – is a larger site located adjacent to the Harpenden Conservation Area. The concern is that access may need to be via roads that cross Harpenden Common.
- Beesonend Lane, Harpenden – likely contributes to the setting of two Grade 2 listed buildings, associated with a former farmstead, and further down Beesonend Lane is a series of cottages that, whilst not listed, have clear historic character. Also, the lane forms the northern extent of Childwickbury Conservation Area. However, site specific policy is clear that access must not be from Beesonend Lane.
- North West Harpenden – Cooters End Lane is a historic rural lane associated with one Grade II listed farmhouse and it is an important walking route, forming part of the Chiltern Way long distance path.
- North of Wheathampstead Road, Harpenden – is adjacent to two Grade II listed buildings, and comprises mature gardens. From the pre-1914 OS map it appears that the listed buildings are associated with Piggotshill Farm, whilst the site was the southwest extent of the parkland associated with 'Highfirs', which is now a golf club. As such, it appears that the site may not have been historically as strongly linked to the listed buildings as might initially thought to be the case on the basis of proximity.
- Hill Dyke Road, Wheathampstead – is adjacent to the west of a large scheduled monument. However, access would be achieved from the north, which likely serves to alleviate concerns (albeit access would involve some loss of a hedgerow shown on the pre-1914 OS map).
- West of Redbourn – the southern extent of the site is in close proximity to the Grade I listed parish church. However, it seems unlikely that development would impact on the setting of the Church, including noting a current planning application, which proposes a green buffer to the south.
- Former Highway Chippings Depot, Lower Luton Road – is 284m from the Grade I listed parish church at Wheathampstead, but this is a small site that gives rise to limited concerns.

6.2.45 With regards to HGC (**Scenarios 2 and 4**), this was historically a raised rural landscape between river / transport corridors and, accordingly, the historic environment sensitivity is primarily associated with a modest scattering of farmsteads, as well as lanes and field boundaries. Overall historic environment sensitivity appears to be quite low, at least in the St Albans part of HGC. The primary area of sensitivity is potentially Westwick Row, close to the southern extent of the HGC area, which is a rural lane associated with a number of listed buildings, including one that is Grade II* listed.

6.2.46 There is also a need to note the extensive Gorhambury Estate located to the east, between the M1 and St Albans. This is a Grade II listed Registered Park and Garden, within which Grade II* listed Gorhambury is located quite centrally. However, it does not seem likely that important views/vistas linked to the house and estate would be impacted by HGC, given topography and noting the historic access points. Also, it seems that there is little if any risk of development creep eastwards towards St Albans over time.

6.2.47 A further consideration is that support for the St Albans components of HGC would help to minimise pressure for extensive housing growth within the Gade Valley, to the north of Hemel Hempstead within Dacorum District, which is quite sensitive in historic environment terms.

6.2.48 With regards to the four strategic urban extension options that feature under **Scenarios 3 and 4** (involving land not 'recommended' by the GB Review), the primary constraint appears to Napsbury Registered Park and Garden (RPG, Grade II), which is adjacent to West London Colney. There would likely be an impact to the setting of the RPG, noting the river valley topography and the accessibility of the RPG. However, there are no listed buildings (the former hospital was built in the early 20th Century), and an agricultural setting will presumably be maintained in perpetuity to the north of the former hospital site, as the agricultural land to the north falls within the designated RPG, whilst land to the south does not.

6.2.49 With regards to North St Albans, there is a need to consider the value of Sandridgebury Lane, which links to Sandridgebury and Sandridge, as well as the Heartwood Forest and the Hertfordshire Way.

6.2.50 Finally, with regards to the strategic urban extension options that would replace HGC under **Scenario 3**, there is a significant concern with the option of an expanded North of St Albans scheme, given the clear potential to impact on the historic setting of the Sandridge Conservation Area, as well as Sandridgebury (two Grade II listed buildings) and Sandridgebury Lane. With regards to the option of strategic growth at NE London Colney and SE St Albans, there appear to be relatively few concerns. Tyttenhanger Park is a Grade 1 listed manor house (now used as a wedding venue) located to the east of London Colney, but the River Colne and Bowmans Lakes would act as a buffer (albeit there is also a need to consider a possible in-combination impact given the option of a new settlement at Bowmans Cross to the south).

6.2.51 In **conclusion**, there is support for Scenarios 2 and 4 because HGC appears to represent a good opportunity to deliver new homes whilst minimising pressure on the historic environment. With regards to Scenario 2, whilst there would be unmet need that would presumably need to be provided for elsewhere within a constrained sub-region, it is fair to highlight some support for this scenario on the basis that St Albans is potentially relatively constrained in historic environment terms in the sub-regional context.

6.2.52 With regards to significant effects, a degree of historic environment impact is inevitable given the number of homes in question, even under the two lower growth scenarios. It is hard to judge what is 'significant'. However, on balance, it is fair to predict 'moderate or uncertain negative effects' under Scenario 3. As well as a number of small allocations subject to constraint, there would be a large urban extension to the north of St Albans that would need to be very carefully considered from a historic environment perspective.

6.2.53 It is important to note that there is often good potential to avoid and mitigate historic environment impacts through policy and at the planning application stage, and this is something that will be explored in further detail at the next stage of plan-making. At the current time, the views of Historic England are sought on the merits of the four reasonable growth scenarios.

Homes

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
3	4	2	1

6.2.54 The headline consideration is the housing requirement that would be set under each of the scenarios, i.e. the number of homes that the Council would commit to delivering annually. It is important to ensure that supply exceeds the requirement (at least in the early years of the plan period, given the potential to boost supply for latter years through a plan review), as failing to deliver on the housing requirement could render the Local Plan out-of-date, such that the presumption in favour of sustainable development applies (such that it is difficult to defend against planning applications that go against the Local Plan).

6.2.55 Under **Scenarios 3 and 4** the housing requirement might be set at Local Housing Need (LHN) with a supply buffer. However, Scenario 4 is the preferable scenario, due to a higher supply buffer and due to the delivery risks associated with the three strategic urban extensions that replace HGC under Scenario 3. At these sites there is a risk that they could not be progressed in a timely fashion. In particular, there is a concern regarding the achievability and deliverability of suitable transport infrastructure solutions. Given these delivery risks, inclusion of these sites in the plan would necessitate a large supply buffer and/or there would be a need for further work leading to significant delays to plan-making (with implications for meeting housing need and/or in respect of continued application of 'the presumption').

6.2.56 In contrast, **Scenarios 1 and 2** would necessitate a housing requirement set significantly below LHN, such that the Local Plan generates significant unmet need. Scenario 2 would involve considerably higher supply but would be associated with a high delivery risk, such that it is not clear that it would be possible to set the housing requirement any higher than under Scenario 1. Generating unmet housing need is highly problematic, from a housing perspective, for two reasons. Firstly, housing need must be met close to source as far as possible. Secondly, there is currently little or no certainty regarding where, when or even if unmet need generated by the Local Plan would be provided for, such that it might stay unmet, thereby perpetuating what is widely believed to be a national housing crisis.

6.2.57 **Scenario 2** also performs very poorly in the sense that housing supply locally would very low in the early years of the plan period (given the lead in time for HGC). There is the potential to argue the case for a stepped housing requirement (i.e. a housing requirement that is initially lower than the average for the plan period, before increasing to a figure above the average), where there is good reason for high reliance on one or more large strategic sites, but that is generally in the context of a plan where the proposal is to provide for LHN over the entirety of the plan period. In practice, supply in the early years of the plan period under Scenario 2 could be so low that the Local Plan is rendered unsound. Meeting housing need locally is clearly an immediate priority, given the third highest affordability ratio of any local authority outside of London (only Elmbridge and Epsom and Ewell, in east Surrey, have higher ratios) and an affordable housing need of arguably 828 dpa (see discussion in Section 5.2).

6.2.58 On the other hand, HGC (**Scenarios 2 and 4**) is supported in three key respects (from a 'housing' perspective). Firstly, HGC will be very well suited to delivering affordable housing (also self-build), whilst certain of the non-strategic allocations that feature under Scenarios 1, 3 and 4 could potentially face viability challenges (given abnormal development costs, and despite viability generally being very strong locally) such that they are not able to deliver the full policy quota of affordable housing. Secondly, HGC is very important for meeting Gypsy and Traveller accommodation needs (see discussion in Section 9). Thirdly, HGC would deliver significant homes beyond the plan period.

6.2.59 Finally, returning to the important matter of providing for Gypsy and Traveller accommodation needs, it is important to note that an expanded North St Albans scheme (**Scenario 3**) would almost certainly enable delivery of a Gypsy and Traveller site. In contrast, the size and configuration of the two other strategic urban extensions that would replace HGC under Scenario 3 could mean that providing for a Gypsy and Traveller site is a challenge.

6.2.60 In **conclusion**, there is clear support for Scenario 4 as the housing requirement would be set at LHN with a sufficient supply buffer, such that here would be confidence in the ability to provide for LHN in practice over the course of the plan period. Furthermore, there would be a balanced supply, in terms of site size, type, location and timetable for development. HGC would feature as part of this, which is supported, from a housing perspective, including due to the potential to deliver two new Gypsy and Traveller sites.

6.2.61 With regards to significant effects, whilst Scenario 4 would represent a considerable step-change, in respect of the local response to what is widely believed to be a housing crisis, it is not possible to predict *significant* positive effects at this stage, given delivery risks and uncertainties. The number of homes anticipated to come forward at HGC is inherently subject to some change due to its scale, and there are numerous sites where further work is needed to confirm deliverability, delivery timescales, yield and viability (with implications for affordable housing delivery). In particular, there are a number of non-strategic site options (i.e. sites 'recommended' by the GB Review) where the potential to achieve suitable and safe access is currently unclear and/or there is a need for further work to explore how to address constraints, which could potentially result in the need to reduce the assumed housing yield. Also, there is a need for further work around providing for Gypsy and Traveller accommodation needs.

Land, soils and other resources

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
1	1	2	1

6.2.62 A foremost consideration here is the potential for loss of **agricultural land** classed as 'best and most versatile' (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a. The nationally available "provisional" agricultural land quality dataset classes the great majority of land in the District as 'grade 3', which may or may not be BMV (the dataset does not differentiate between grades 3a and 3b). There is a concentration of grade 2 quality land within the central and southern central part of the District (i.e. St Albans and land to both the east and west), but it is important to note that the dataset is very low resolution (for example, it does not recognise Wheathampstead as an urban area). Another dataset is available showing agricultural land quality with a much higher degree of resolution and accuracy, namely the "post 1988" dataset (see magic.gov.uk), which reflects the outcomes of field surveys. However, this dataset is very patchy, covering only perhaps 10% of the District (and even less nationally).

6.2.63 In light of these introductory points, it is difficult to differentiate between the growth scenarios with confidence. It is not possible to conclude a preference for lower growth scenarios, as St Albans cannot be said to be particularly constrained in the sub-regional context (the national dataset shows SW Herts to be mostly grade 3 quality land, whilst within NEC Herts there is significant grade 2 quality land, and West Essex is associated with very widespread grade 2 quality land). Other points are as follows:

- The majority of the HGC area has been surveyed and found to mainly comprise grade 3b quality land, although there is also considerable grade 3a and a small area of grade 2. This is somewhat contrary to the national "provisional" dataset, which suggests a concentration of grade 2 land in this area. The parts that have not been surveyed appear less likely to comprise BMV land, according to the national dataset.
- Of the strategic urban extension options, only one has been surveyed in detail, namely North St Albans, which is found to comprise primarily grade 3a quality land. Also, land adjacent to the east of 'East St Albans' has been surveyed and found to comprise a mix of grades 2, 3a and 3b.
- Much of the land in the vicinity of Bowmans Cross (in Hertsmere District, to the southeast of London Colney) has been surveyed in detail and found to include some areas of grade 1 quality land).
- With regards to the package of non-strategic urban extension options that features under Scenarios 1, 3 and 4, one consideration is that a number of the sites comprise small areas of greenfield land not in agricultural production, and with limited or no realistic potential of being used for agriculture (which is not to say that the land could not be used for food growing, e.g. allotments or orchards).

6.2.64 A further consideration is the potential for sterilisation of **minerals resources** that could potentially be viably extracted, with much of the District (less so Harpenden) intersecting a Minerals Safeguarding Area,

as understood from the policies map of the emerging Draft Hertfordshire Minerals and Waste Local Plan. A sand and gravel safeguarding areas covers most of the central and southern part of the District, and HGC also partially intersects a Brick Clay safeguarding area. However, it is also important to note that safeguarding is not absolute, as explained by the Minerals Safeguarding Practice Guidance (Mineral Products Association, 2019): *"Allocation of sites for non-minerals development within MSAs and proximate to safeguarded minerals infrastructure sites should be avoided where possible… However, safeguarding is not absolute. Where other considerations indicate that a proposed site allocation within an MSA is appropriate… [employ] mitigation measures to reduce the… amount of resource sterilised."*

6.2.65 In **conclusion**, whilst there is little certainty, on balance there is a preference for HGC over the alternative of strategic urban extensions to St Albans and London Colney.

6.2.66 With regards to significant effects, broadly neutral effects are predicted. Whilst there would be significant loss of productive agricultural land under all scenarios, it seems likely that the majority would not be of 'BMV' quality. Also, it is important to recognise that best use would be made of brownfield development opportunities under all scenarios, and also that any unmet need resulting from the St Albans Local Plan could potentially lead to increased pressure for development of BMV agricultural land elsewhere.

Landscape

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
2	2	2	1

6.2.67 Landscape is a key constraint to growth locally. Whilst there are no nationally designated landscapes intersecting the District, the north / northwest part of the District is associated with the dip slope of the Chilterns and, in turn, is associated with a series of valleys / dry valleys and raised plateaus. In turn, this landscape pattern is associated with long distance views and characteristic land uses, for example areas of woodland and common land, as well as characteristic settlement pattern. It is important to note that a Chilterns AONB boundary review is underway, which might see the AONB extended into the District.

6.2.68 With regards to the southern part of the District, this is a valley / vale associated with the River Colne – a major tributary of the Thames – with a clay dominated, but complex geology that also includes glacial and peri-glacial deposits (from the last Ice Sheet to reach into Hertfordshire, namely the Anglian Icesheet) and the deposits from the proto-Thames (i.e. the route of the Thames prior to the Anglian Icesheet). The geology and topography supported extensive 20th Century settlement and transport infrastructure, as well as minerals extraction (sand and gravel) and hospitals sites. There is also a concentration of historic stately homes / estates. Both the Bricket Wood and Colney Heath areas historically comprised extensive woodland and common land, reflecting the nature of the geology and soils.

6.2.69 There is also a need to consider the London Metropolitan Green Belt, which is not a landscape designation but is indicative of a landscape that is sensitive in the sense that countryside encroachment and loss of settlement separation can be issues that generate concern. A key issue is maintaining settlement separation in the southern part of the District. However, on the other hand, the settlement pattern in this area is primarily a 20th century construct, with the only (pre-20th Century) conservation areas at Park Street and Frogmore (located on Watling Street, an ancient route linking Dover to the Midlands) and London Colney (where there is a small historic core associated with a crossing point of the R. Colne).

6.2.70 In light of these introductory comments, detailed considerations are as follows:

- Non-strategic sites 'recommended' by the GB Review (**Scenarios 1, 2 and 4**) – sites tend to be well-contained within the landscape by existing built form, transport infrastructure or landscape features such as strong hedgerows.[23] This will correlate with limited landscape sensitivity. However, numerous sites are associated with sensitive views from roads / lanes and public rights of way, such that they will

[23] The Inspector examining the previously submitted St Albans Local Plan (2018; withdrawn 2020) was critical of the lack of smaller sites in the plan, stating: *"It also recognises that it is possible that additional potential small-scale boundary changes that would also not compromise the overall function of the Green Belt..."*

contribute to appreciation of landscape character. A number of the issues/impacts discussed above under the 'Historic environment' heading are also relevant to the discussion here; for example, the site option at the southwest edge of Wheathampstead is likely to have a degree of landscape sensitivity as it is highly visible from a historic lane (also a public footpath) that is likely to be a popular route linking Wheathampstead to the historic hamlet of Amwell as well as Nomansland Common / Heartwood Forest.

- Strategic urban extension options 'recommended' by the GB Review (**Scenarios 1, 2 and 4**) – North West Harpenden is arguably subject to the greatest degree of constraint, given rising land visible from the A1081 Luton Road ('filtered' views) and given the adjacent Chilterns Way long distance footpath (not necessarily one of the more sensitive sections of the path, although there is a need to consider an increasing focus nationally on designating rural lanes as Quiet Lanes). However, on the other hand, the site would be well-contained within the dry valley that historically contained the built form of Harpenden, prior to 20th Century expansion to the east (spilling into the valley of the River Lee) and to the southwest (raised land historically associated with common land). N.B. the corollary of close association with the dry valley is strong association with an A-road corridor but also a surface water flood channel.

  With regards to West Redbourn, the adjacent M1 is clearly an urbanising influence, and there are very limited views from roads or lanes, with the settlement 'facing away' from the site. However, there is a high density of public rights of way, including the Hertfordshire Way long distance path.

  Finally, there is a need to consider the option of a strategic urban extension to the east of Hemel Hempstead involving only land 'recommended' by the GB Review, specifically land either side of the A414, with the assumption being that the scheme would comprise roughly 2/3 employment land and 1/3 housing (~740 homes). Landscape containment appears to be somewhat weak, at least in comparison to most other land parcels 'recommended' by the Green Belt Review, such that the concern might be that there is pressure to develop adjacent land in the future, e.g. through the next local plan. Piecemeal growth of this nature could lead to opportunities missed, in terms of securing investment and strategic infrastructure, relative to a comprehensive approach to growth, i.e. support for HGC in full.

- Hemel Garden Communities (HGC) in full (**Scenarios 2 and 4**) – as discussed previously, this is a raised landscape between river corridors that was historically sparsely settled. In the central part of the area the Maylands Industrial Estate and the A414 and M1 J8 are major urbanising influences. Elsewhere, there is a fairly low density of lanes and public rights of way through the area, but there are clear and somewhat extensive views from the two road corridors historically linking Hemel Hempstead (which was a historic settlement, prior to major 20th Century expansion) to Redbourn / Harpenden and St Albans, as well as from the Nickey Line (the former Harpenden to Hemel Hempstead branch line, which is now a leisure footpath and cycleway). To the south of the area there appears to be good potential to draw-upon topography to secure a defensible new Green Belt boundary, and hence avoid concerns regarding future development creep (the A4147 follows something of a ridge of raised land). This is not the case to the north, where the B487 / Nickey Line corridor follows a shallow valley towards Redbourn; however, in practice, this is the proposed location for a new country park, which serves to greatly reduce concerns. Another key consideration is that support for the St Albans components of HGC will held to reduce pressure for extensive growth within the Gade Valley to the north of Hemel, which is sensitive in landscape and wider terms, including close links to the Chilterns AONB.

- Other strategic urban extension options featuring in **Scenarios 3 and 4** – taking these sites in turn:

  – North East Harpenden – is associated with a quite steeply rising land from the River Lee / Lower Luton Road. As discussed above, Harpenden was historically associated with the dry valley to the west, with limited built form (but considerable industry) along the Lee Valley (which also formerly supported a Luton Branch of the train line to Cambridge). There is a clear argument for seeking to draw upon topography to contain the expansion of Harpenden, and particularly avoiding problematic 'sprawl' along the river valleys or onto raised land associated with extensive woodland and common land. In this respect, a key point to note is the proposal to leave the highest point of land within the submitted HELAA site undeveloped, and also to draw upon Bower Heath Lane (which follows a shallow valley) as a new defensible Green Belt boundary. There appears to be fairly limited sensitivity in respect of views from road/lanes and public rights of way, and the possibility of improving the public rights of way network – such that Harpenden is better linked to the Lee Valley and raised Chilterns landscapes south of Luton – might feasibly be explored. Finally, it is important to note that a Chilterns AONB boundary review is currently underway; however, there is little reason to suggest a likelihood of a new boundary extending this far to the east and south to include the northeast edge of Harpenden.

  – North St Albans – Sandridgebury Lane follows a shallow valley, with higher ground to the south (Bernard's Heath, now within the St Albans urban area) and to the north (Childwick Green and the

Heartwood Forest). This arguably lends a degree of support for growth in this area, from a landscape perspective, and there is also a need to factor in the adjacent site with planning permission for 150 homes. There is also a need to note the urbanising influence of the Porters Wood industrial area to the south; however, on the other hand, there is an argument to suggest that the industrial area, along with its two valued linear woodlands (Beech Bottom and Long Spring) and nearby St Albans Girls School, represents an appropriate northern extent to the St Albans urban area, from a landscape perspective. There is also a need to note the public right of way following Long Spring, which is likely to be a popular walking route linking St Albans to the Heartwood Forest. It appears to be the case that the footpath partly follows Sandridgebury Lane, hence increased traffic should be avoided.

– East St Albans – is potentially subject to relatively limited landscape constraint, noting that the eastern edge of St Albans is associated with the relatively flat landscape of the Colne Valley, as opposed to the raised, rolling landscape of the Chilterns dip slope. Also, there is a need to consider that there is currently built form adjacent to the north of the site, as well as to the south (Oaklands College and, beyond that, along Hatfield Road). However, on the other hand, the landscape / Green Belt gap to Hatfield is a sensitivity, and there is also a need to note that a public bridleway runs adjacent to the site. The bridleway could assist with securing a new Green Belt boundary, however, there is also a need to consider that the location for a new secondary school has yet to be determined, and it will likely be located outside the site, such that there are additional landscape / Green Belt impacts (there may be a preference for a location accessed from the Hatfield Road, as per Oaklands College).

– West London Colney – comprises flat, low-lying land associated with the Colne Valley. However, the site is highly visible from the B5378 Shenley Road (with a prominent historic building at the edge of the Napsbury Park Conservation Area visible beyond) and there are also extensive views across the site (towards the River Colne and raised wooded land beyond) from Napsbury Park, which is an important publicly accessible parkland. There is also a need to consider the important bridleway adjacent to the site, which forms part of a network of public rights of way along the Colne Valley. However, on the other hand, this landscape is set to change and evolve, given the Government-permitted SRFI and associated country parks. It will be important to take a strategic approach to masterplanning across the broad landscape stretching from the M25 to Napsbury Park.

- Other strategic urban extension options featuring in **Scenario 4**– taking these sites in turn:

– Expanded North St Albans – land rises from the B651 to a modest high point associated with a strong hedgerow and an area of woodland, hence there would be some potential for a modest scheme east of the railway to be well-contained in landscape / Green Belt terms. However, were growth to extend beyond this high point it is difficult to see a logical means of containing expansion short of the Hertfordshire Way and Heartwood Forest. It is also important to note that an expanded North St Albans scheme could potentially involve additional growth to the west of the railway, i.e. expansion of the scheme beyond the tree belt that would contain the 'North St Albans' scheme discussed above. There is a clear landscape / Green Belt argument against taking this step, and transport connectivity could also be a challenging, with land here ~3.5km from St Albans train station.

– South East St Albans – this is flat and low-lying land, and there would appear to be fairly good potential to define a new defensible Green Belt boundary, with the new urban edge defined by cemetery, a strong hedgerow associated with a public footpath and a field behind Highfield Farm that would be well-suited to delivering a new parkland. There would then be a landscape / Green Belt gap of over 400m to the A414 (with London Colney beyond) and there would be little concern regarding future development creep to the east. There would, however, be landscape impacts associated with the public rights of way through the area, including Nightingale Lane, which is likely to be a popular route linking St Albans to London Colney. It is noted that a scheme would extend beyond a significant area of woodland planting dating from ~2005, and presumably delivered including with a view to securing a new defensible boundary to the urban area, following development of Highfield Park.

– North East London Colney – there is considered likely to be relatively low landscape sensitivity, given the influence of the two dual carriageways in this area. However, the southern part of the site is associated with long distance views over the River Colne valley, and there would be a need to carefully consider the in-combination of effects of potential growth within Hertsmere, including the possibility of a major new settlement at Bowmans Cross, to the south of the river. As discussed under other headings, there could be an opportunity for growth to support enhancements to the river corridor / Bowmans Lakes / Tyttenhanger Park / Willows Activity Centre area.

6.2.71 In **conclusion**, there is support for HGC from a landscape perspective, albeit this is raised land not without landscape sensitivities, including given the adjacent Chilterns AONB. There is also support for providing for LHN, mindful of the Chilterns AONB constraining Dacorum and also narrow Green Belt gaps between settlements constraining other neighbouring local authorities.

6.2.72 With regards to significant effects, 'moderate or uncertain negative effects' are predicted under all scenarios. Even under the best performing scenario there are clearly still significant landscape sensitivities, with a need for further work in respect of masterplanning and defining new Green Belt boundaries prior to plan finalisation.

Transport

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
3	2	2	1

6.2.73 Transport objectives are centrally important to local plan spatial strategy / site selection nationally, and this is particularly the case within the St Albans context. There is a need to minimise the need to travel (i.e. ensure new homes in proximity to key destinations), support modal shift away from the private car towards public and active transport (also mindful of 'future mobility' options) and also support the national switchover to electric vehicles (EVs; also mindful that hydrogen vehicles could play an increasing role) alongside micro-mobility and use of technology. Support for the achievement of transport objectives will have wide-ranging benefits in respect of other key objectives for the Local Plan, including decarbonisation.

6.2.74 In light of these introductory comments, detailed considerations are as follows:

- **Growth quantum** – there is a clear need to provide for housing needs as close to source as possible, from a transport perspective. Furthermore, early commitment to providing for LHN in full, as opposed to generating unmet need to be provided for elsewhere within a constrained sub-region, is conducive to early and effective strategic transport planning, e.g. planning for sub-regionally significant infrastructure.
- Non-strategic sites (**Scenarios 1, 3 and 4**) – the great majority of land parcels 'recommended' for further consideration by the Green Belt Review and intersecting a HELAA site are proposed for allocation under Scenarios 1, 3 and 4, with no land parcels not supported on transport grounds (see Section 5.4 and Appendix VI). Sites at the southern extent of Harpenden warrant mention as relatively poorly connected in transport terms, on the basis of distance to Harpenden town centre / train station and schools, plus the largest of the sites (Cross Lane, 95 homes) is seemingly accessed via narrow roads associated with the common; however, these sites are in fairly close connectivity to a key bus corridor (the A1081).

  However, it is the proposed allocation at Gustard Wood that appears to be the site most poorly linked, such that it warrants further scrutiny on transport grounds (and/or consideration might be given to the possibility of large-scale growth at Gustard Wood, in order to deliver a village centre and primary school). Also, several sites are associated with somewhat uncertain access arrangements at the current time, leading to uncertainty in respect of the potential for safe and attractive walking and cycling connectivity.
- Strategic urban extension options 'recommended' by the GB Review (**Scenarios 1, 3 and 4**) –
  - North West Harpenden - is tentatively supported on transport grounds, given: proximity to Harpenden town centre and train station (also a relatively flat route); proximity to a local centre (near adjacent, with potential for enhancement); proximity to the Nickey Line; and the potential for upgraded cycle infrastructure in line with the LCWIP (although the ability to deliver a cycle route into the town centre is hampered by a narrow railway bridge). However, the potential for a high proportion of southbound car journeys to pass through Harpenden town centre (also St Albans) can be envisaged, and there are concerns in respect of rat-running along rural lanes, plus there is a need to consider in-combination impacts with other allocations. The town contains some traffic hotspots (see Figure 2.3 within the Hertfordshire Active Travel Strategy, 2023) with some inherent constraints associated with roads needing to cross two train lines and the River Lee, and Harpenden is not as well-connected to the strategic road network as is the case for certain other settlements locally and across the sub-region.

– West Redbourn – there are access / transport challenges given the linear configuration of the site and limited current road access options. There is a clear argument for avoiding increased traffic along Lybury Lane, to the north, as this is a narrow rural lane, whilst access from the south potentially gives rise to a concern regarding traffic through the Redbourn Conservation Area. The site is in relatively good proximity to a local centre, but Redbourn has no secondary school and little employment.

– Glinwell (east of St Albans) – is relatively distant from St Albans city centre and train station, but well connected by bus and by an offroad cycle route. It is equally well-connected by bus and bike to Hatfield, such that the site benefits from reasonable or good accessibility to two high quality train lines. Finally, Oakland College is nearby, and the proposal is to deliver a new secondary school in this area.

– Burston Nurseries, How Wood – performs reasonably well in transport terms, given: good access to the strategic road network; a station on the Abbey Line within walking distance; and a nearby national cycle route linking to St Albans and Watford. However, How Wood is a lower order settlement, with little in the way of local services and facilities (although there is employment within cycling distance).

– North Radlett - the site does not relate very well to the edge of Radlett, and the nearest primary school would be some way distant, but Radlett Station (with a good service to London St. Pancras) would be under 2km distant, with good footpath connectivity. Furthermore, there is understood to be an opportunity to improve pedestrian / cycle connectivity into Radlett, subject to further work. Another factor is that St Albans-bound journeys would be via the A5183, which passes through the Frogmore Conservation Area. However, the Government permitted SRFI is set to deliver a bypass. Finally, it is noted that concerns have been raised about safety at the adjacent Watling St. / Harper Ln. junction.

- Hemel Garden Communities (HGC) in full (**Scenarios 2 and 4**) – as discussed in Section 5.2, there is considered to be a significant transport-related opportunity. However, there is a need to distinguish between inherent locational opportunities and scheme-specific opportunities (i.e. opportunities to be realised through carefully considered masterplanning, boosted on account of the scale of the scheme). With regards to the latter, the opportunity is clear and need not be discussed further here. With regards to the former, key opportunities relate to: supporting aspirations for transformational upgrades to the A414 corridor between Watford and Harlow; the potential to walk and cycle to employment (at significantly expanded Maylands Estate); and the potential to connect to the town centre and train station via an extended Nickey Line. However, there is a need to recognise that the town centre is distant, and the train station further still (comparisons can be drawn with Harlow and Gilston Garden Town). The potential for a high proportion of journeys by private car to certain key destinations (Watford, Luton, Rothamsted Research, BRE) can be envisaged. A Transport Vision & Strategy for HGC is underway.

- Other strategic urban extension options featuring in **Scenarios 3 and 4** – taking these sites in turn:

  – North East Harpenden – is somewhat peripheral to the town, and not located on an A-road corridor. However, it is in good proximity to a town centre and train station relative to certain other site options, and a recently opened secondary school is nearby. There is a need to consider the in-combination traffic effects of allocating this site alongside other allocations involving land 'recommended' by the Green Belt review, also mindful of car journeys from Redbourn and Wheathampstead to Harpenden. A further consideration is the possible future expansion of Katherine Warrington Secondary School, in support of growth at Harpenden, Redbourn and Wheathampstead, given no plans to deliver a new secondary school in this part of the District.

  – North St Albans and East St Albans – neither site gives rise to any clear transport concern, given good connectivity to a top-tier settlement, plus reasonable connectivity to key destinations outside of the District. However, opportunities are seemingly also fairly limited - primarily relating to enhanced cycle connectivity and support for key bus services. The sites are distant from the key A414 corridor.

  A particular opportunity is in respect of a new cycle route along the A1081 between St Albans and Harpenden, which is a priority within the St Albans LCWIP. The LCWIP discusses the cost of St Albans – Harpenden A1081 cycle infrastructure upgrades as being in the region of £15m, which is more than the funding available for the whole of Hertfordshire through the Government's Active Travel Fund for the period 2020-2023. This serves to highlight the important of developer funding (S106).

  Also, with regards to the A1081 as a cycle corridor, it is noted that the Harpenden Neighbourhood Plan states: *"St Albans City and District Council has provided a shared surface cycle and pedestrian route along the edge of the A1081. However, this route is limited in width and many cyclists use the road instead. A separate cycle route could provide a popular route in a similar style to the Nickey Line... improvements to the Harpenden to St Albans Cycle Route through the provision of a cycle only lane from Beesonend Lane past West Common would be supported."*

  - West London Colney – London Colney is a lower order settlement (in comparison to St Albans and Harpenden), and there is no train connectivity (although Radlett Station is within ~5km by road; improved connectivity could be explored). However, there is very good access to the strategic road network and delivering a new secondary school is strongly supported from a transport perspective.

- Other strategic urban extension options featuring in **Scenario 3** – taking these sites in turn:
  - Expanded North St Albans – as discussed elsewhere, this is potentially highly problematic from a transport perspective, as access would need to be via the B651, where there is understood to be little or no potential for upgrades, e.g. to introduce a cycle route. Also, the train line is a barrier to movement.
  - South East St Albans – this site appears to perform no worse than the two St Albans strategic urban extensions options discussed above, from a transport perspective. Connectivity to the town centre and train stations is similar or better, and the site is well-connected to the strategic road network. The LCWIP discusses the potential for a new cycle route along the A1081 London Road.
  - North East London Colney – there is no certainty regarding what steps could be taken to secure suitable access onto the strategic road network, into London Colney and into St Albans. The site is poorly connected to a train station, but there could be the potential for growth in here in combination with growth to the South East of St Albans to support new transport infrastructure, and perhaps broadly support aspirations for delivering strategic upgrades to the A414 corridor.

6.2.75 Finally, with regards to **Scenario 3**, which would see in the region of 4,000 homes delivered via strategic urban extensions to St Albans and London Colney, in place of HGC, there is a need to consider in-combination impacts on the functioning of the road network, also mindful of the Government permitted SRFI. Whilst it is not possible to be certain in the absence of transport modelling (which is costly, such that work must be carefully targeted), there could be a risk of 'severe' impacts (NPPF para 111).

6.2.76 With regards to both **Scenarios 3 and 4**, a final point to note (also relevant to discussions under other headings) is that all of the strategic urban extension options involving land not 'recommended' by the GB Review are located outside of the 12.6 km zone surrounding Ashridge Woods and Commons SSSI within which there is a requirement to ensure access to Suitable Alternative Natural Greenspace (SANG) and make financial contributions to Strategic Access Management and Monitoring (SAMM). This could help to ensure funding is available for transport infrastructure and other measures such as affordable housing.

6.2.77 In **conclusion**, there is support for providing for LHN in full, albeit there are inherent transport challenges affecting the District, including road infrastructure constraints affecting St Albans and Harpenden (albeit both towns are well-served by a high-quality train service). Also, there is support for HGC in transport terms, particularly because of the opportunity afforded by the scale of the scheme, although there are also certain location-specific opportunities (A414, employment, Nickey Line).

6.2.78 Scenario 1 performs poorly as it would generate a significant quantum of unmet need (~6,000 homes) that could be highly challenging to provide for from a transport perspective. Furthermore, it could transpire that the Dacorum component of HGC cannot be delivered, leading to pressure to deliver new homes in locations that are problematic from a transport perspective (both Berkhamsted and Tring are bypassed by the A41, but north-south road routes are less strong, and Tring has limited train connectivity).

6.2.79 With regards to significant effects, 'moderate or uncertain effects' are predicted for the best performing and worst performing scenarios. Directing growth within the District and sub-regionally so as to align with transport objectives is crucially important for decarbonisation and wide-ranging other objectives. Transport is also a key priority amongst local residents, with the option of focusing growth along transport corridors found to perform strongly through the recent SW Herts JSP consultation, and the option of 'growing the best-connected places' also performing well. Further work might be undertaken ahead of plan finalisation to ensure that growth is being directed so as to best support transport objectives.

Water

Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
=	=	=	=

6.2.80 **Wastewater / sewage treatment** is often a key issue for local plans and is high on the agenda nationally and locally at the current time. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works, with the other consideration being the biological and chemical capacity of the receiving water course to accept an increase in treated water). However, there are major cost and lead-in time implications, and a risk of unforeseen issues and delays.

6.2.81 As such, there is a need to provide the water companies with early certainty regarding growth locations, including in respect of total growth quantum within St Albans District. Also, strategic growth locations can be conducive to planning for strategic infrastructure upgrades (also measures aimed at water efficiency).

6.2.82 The Hertfordshire Water Study was published in 2017, such that it is now somewhat dated, and consideration might be given to an updated Water Cycle Study. Section 8.6 of the 2017 Study deals with St Albans, giving consideration to strategic interventions needed on the basis of growth assumptions.

6.2.83 The Hertfordshire Water Study concludes:

"The majority of the indicative growth areas (identified to facilitate the modelling) for the 2021 and 2031 scenarios are grouped into three areas, Harpenden, East Hemel Hempstead and east of Albans. By 2051, other indicative growth areas become focused to the southeast of St Albans (adjacent to Hatfield), south of St Albans, adjacent to Watford and around Redbourn. [Conclusions are:]

- *Any development proposals around the southern and eastern edges of St Albans are likely to require strategic intervention in 2051, potentially linked to large-scale trunk sewer upgrades*
- *The evaluation indicates… uncertainty in 2051, with the high scenario demonstrating strategic intervention could be required across the southern part of the District (mainly to improve the capacity of Maple lodge STW and Blackbirds STW). This scale of intervention could require… local planning policies and / or construction methods to limit foul flows and promote large-scale water recycling."*

6.2.84 It is also important to note Dacorum section of the Study (Section 8.2), including discussion of arguments for focusing growth at Hemel Hempstead in order to minimise pressure on Berkhamsted.

6.2.85 Furthermore, there is a need to note the sections of the Hertfordshire Water Study (2017) dedicated to the sub-catchments intersecting the District and also Hemel Hempstead, namely:

- Harpenden (Section 9.8) – the Study raised few concerns: *"All foul flows are served by a single sewer network which discharges into Harpenden STW…The strategic water infrastructure needs are likely to be limited to local network upgrades, potentially requiring focused planning from 2021…"*
- Hemel Hempstead (Section 9.9) – more significant concerns are raised: *"All foul flows are served by a single sewer network, part of the larger strategic network which discharges into Maple Lodge STW. The strategic water infrastructure needs are likely to be short-term water quality, within the upper reaches of the River Gade through into central Hemel Hempstead, and long-term treatment capacity at Maple Lodge STW. Water quality could become a major driver of investment due to the current poor classification of the River Gade (in this location)..."*
- St Albans and Upper Colne Valley (Section 9.13) – *"This sub-catchment has been defined based on the extent of the trunk sewer network discharging to Maple Lodge STW, upstream of the Blackbirds SPS, which includes St Albans, Hatfield, Potters Bar, London Colney, Borehamwood and Radlett. It covers the majority of the St Albans District, the eastern half of Hertsmere and the southwest section of Welwyn Hatfield. The strategic water infrastructure needs are likely to primarily be network capacity, requiring specific intervention for 2021 and more widespread investment for 2051 to facilitate the extensive projected growth around St Albans, Potters Bar, Radley and South Colney."*

6.2.86 Further evidence in respect of wastewater / sewage treatment comes from a nationally available mapping resource showing the location of sewage treatment works (STW) locally and also the incidences of hydraulic capacity breaches leading to raw sewage being discharged in 2022. Points to note are:

- Harpenden STW was not highlighted as particularly problematic by the 2017 Hertfordshire Water Study; however, there were five incidences of raw sewage discharge in 2022 for a total of 47 hours.
- In contrast, there were no raw sewage discharges reported at Blackbirds STW, located to the south of Bricket Wood, which is discussed within the 2017 Hertfordshire Water Study.
- A key constraint appears to be Maple Lodge STW, which is located south of Rickmansworth and serves a very extensive area. In 2022, the sewer storm overflow spilled 23 times for a total of 204 hours (albeit there is a need to note that the Colne is a larger river at this point).

6.2.87 Finally, evidence comes from the emerging St Albans Infrastructure Delivery Plan (IDP), which finds:

"The majority of wastewater from the St Albans region is treated at the Maple Lodge STW, and the treatment works is already operating at close to capacity and frequently gets overwhelmed... The Maple Lodge catchment is very large and covers multiple local authorities, so it is important that growth in St Albans is aligned with growth in the rest of the catchment area to avoid worsening capacity issues at the STW. Upgrades to Blackbirds STW have been proposed in the Thames Water DWMP, but this is yet to be confirmed by Thames Water. Investment by Thames Water to increase the capacity of Blackbirds STW could relieve pressure due to growth on Maple Lodge STW. During stakeholder consultation in May 2023, Thames Water indicated that neither growth scenario presented will likely cause significant issues on the wastewater network and therefore capacity is expected to be available to support the growth."

6.2.88 The IDP draws upon the Thames Water Drainage and Wastewater Management Plan (DWMP, 2023), which is available here. It is noted that the plan does not consider Hemel Garden Communities, which potentially represents an opportunity missed (i.e. earlier certainty on HGC could have enabled explicit consideration). It is also noted that there is no discussion of Maple Lodge STW.

6.2.89 In addition to wastewater treatment, **water supply** can be a key issue within problematic water resource zones, as established by the work of water companies and the Environment Agency. As well as leading to impacts for potable water supply, 'water stress' also affects the natural environment; for example (and notably) there is a risk of problematic low flows affecting the internationally important chalk streams that drain the Chilterns within the District and elsewhere in the sub-region, flowing into the Rivers Colne and Lee (which, in turn, are tributaries of the River Thames). However, water companies put in place long term plans to balance water supply and demand, and there are not currently any water resource zones that are known to be problematic to the extent that there is a clear constraint to strategic growth.

6.2.90 The District is supplied water by Affinity Water (whilst wastewater is managed by Thames Water), which has a legal requirement to supply water to new developments. Affinity Water has produced a Water Resources Management Plan (WRMP) which sets out how it plans to provide a reliable, resilient, efficient and affordable water supply to customers whilst protecting the environment. At the core of this is the need to balance the amount of water available for supply with the demand for water. The most recent WRMP covers the period 2020-2080 and identifies a significant supply / demand deficit in the Central Region (which covers St Albans District); which it plans to address through demand management and leakage reduction measures, and through transferring water from neighbouring areas.

6.2.91 In **conclusion**, it is not possible to differentiate between the growth scenarios with any certainty at this stage. There is theoretical support for setting the housing requirement at LHN, with a view to early and effective planning for water infrastructure (as opposed to generating unmet need that will then need to be provided for at locations unknown within a constrained sub-region). However, it could potentially be the case that there are particular constraints affecting St Albans, in terms of water quality and/or water resources. With regards to HGC (Scenarios 2 and 4), there is support for growth at scale, but there is a need to confirm wastewater treatment options, e.g. noting potential issues affecting Maple Lodge STW, given the extent of its catchment area. There is also a question-mark regarding the high growth scenario for St Albans (Scenario 3) and also possibly a high growth strategy for Harpenden (Scenarios 3 and 4).

6.2.92 With regards to significant effects, it is appropriate to flag 'moderate or uncertain' negative effects at this stage, ahead of receiving consultation responses from the Environment Agency, Thames Water and Affinity Water. Comments on the relative merits of the growth scenarios would be welcomed.

Appraisal summary

6.2.93 The table below present a summary of the appraisal of reasonable growth scenarios presented above. To reiterate, within each row, the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence); and then **2)** categorise performance in terms of 'significant effects' using red / amber / light green / green.

***Table 6.1**: The reasonable growth scenarios – summary appraisal findings*

Topic	Scenario 1: Low growth No HGC	Scenario 2: Low growth With HGC	Scenario 3: LHN No HGC	Scenario 4: LHN With HGC
	Rank of preference (numbers) and categorisation of effects (shading)			
Accessibility	2	2	2	★1
Air and wider env quality	2	2	2	★1
Biodiversity	2	★1	★1	★1
Climate change adaptation	2	★1	★1	★1
Climate change mitigation	3	2	2	★1
Communities and health	★1	★1	2	★1
Economy and employment	3	2	2	★1
Historic environment	2	★1	3	★1
Homes	3	4	2	★1
Land, soils and other resources	★1	★1	2	★1
Landscape	2	2	2	★1
Transport	3	2	2	★1
Water	=	=	=	=

6.2.94 The appraisal shows **Scenario 4** to perform well in terms of a wide range of sustainability objectives, relative to the other three scenarios appraised. However, it does not necessarily follow that Scenario 4 is best performing overall, or best represents sustainable development. This is for two reasons:

- For several topics (biodiversity, climate change adaptation, communities, historic environment and land) the appraisal is finely balanced, such that new evidence could quite easily serve to tip the balance of favour. Equally, further evidence might arise in respect of 'water' that is not supportive of Scenario 4.
- The appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each of the SA topics. It is for the plan-makers to assign 'weight' to topics/objectives and *then* decide which scenario best represents sustainable development *on balance* (see below).

6.2.95 With regards to Scenarios 1, 2 and 3, matters are finely balanced. Key considerations include:

- The low growth scenarios (**Scenarios 1 and 2**) are supported in respect of some environmental topics, but not all, given an assumption that the resulting unmet need would have to be provided for elsewhere within a constrained sub-region. Equally, low growth is not supported from a transport perspective, because it is important to provide for housing need close to source and also provide for early certainty regarding broad distribution of growth sub-regionally in support of effective strategic transport planning. Finally, low growth is not supported from a decarbonisation perspective, including because development viability is high locally, leading to potential to exceed the emissions requirements of Building Regulations.
- **Scenario 1** performs poorly because of the unmet housing need that would be generated and because growth related opportunities would be missed (e.g. new secondary schools), both at Hemel Garden Communities (HGC) and at four other strategic growth locations that feature in Scenarios 3 and 4.
- **Scenario 2** performs particularly poorly in terms of 'homes' objectives, because the District's housing supply would be overly reliant on a single site (HGC), leading to delivery risk, plus there would be very low supply early in the plan period (before HGC delivers) and very locally arising needs would go unmet.
- **Scenario 3** performs poorly in certain respects as HGC would be replaced by three strategic urban extensions that are subject to constraint (including in combination, particularly at the St Albans City-scale, e.g. in terms of traffic congestion) and would be a difficult 'sell' to the local community, as the growth related / planning gain opportunities are relatively limited in comparison to other strategic options.

6.2.96 Finally, taking each of the key 'variables' in turn:

- **Hemel Garden Communities** (Scenarios 2 and 4) – there are a range of issues and tensions with sustainability objectives, which is inevitable given the scale of HGC, and there are also a range of uncertainties at this stage in the Local Plan process, despite work having been ongoing for several years (potentially reflecting the fact that work has been undertaken in the context of policy uncertainty).

  However, there is clear evidence to suggest that, for a wide range of sustainability objectives, St Albans Local Plan scenarios without HGC give rise to *greater concerns* than is the case for scenarios with HGC, whether that is a low growth scenario (Scenario 1) or a scenario whereby HGC is replaced by strategic urban extensions (Scenario 3). Furthermore, without St Albans support for HGC it may not be possible for Dacorum to take HGC forward, with implications for the Dacorum Local Plan and, in turn, wider knock-on effects. It is crucially important to consider the merits of HGC in this wider strategic context.

  Scenarios including HGC perform well in terms of:

  – Accessibility – there is a major opportunity to deliver community infrastructure alongside new homes, including secondary school capacity and including to the benefit of existing communities locally.

  – Biodiversity – it is key to deliver new homes alongside Suitable Alternative Natural Greenspace (SANG) in west St Albans and Dacorum. Also, HGC is fairly unconstrained in wider biodiversity terms.

  – Climate change adaptation (flood risk), historic environment, land (particularly best and most versatile agricultural land) and landscape – the St Albans HGC area is fairly unconstrained, again mindful of where/how this quantum of homes might alternatively be delivered. Proximity to the Chilterns AONB is noted, as is ongoing Chilterns AONB boundary review. Also, the land is mostly not "recommended for further consideration" by the Green Belt Review. However, landscape and Green Belt concerns can be mitigated, including via strategically located SANG and a new country park. Also, support for the St Albans components of HGC would serve to minimise pressure on the Gade valley in Dacorum.

  – Climate change mitigation – large-scale strategic growth can lead an opportunity to minimise built environment emissions per head of population ('per capita'), with transport emissions also key.

  – Economy – Scenarios 1 and 3 assume that a strategic expansion of the Maylands Estate could be delivered without support for wider HGC, but this is uncertain, and would clearly be sub-optimal.

– Historic environment – although there will be impacts to a historic rural landscape including historic farmsteads, and proximity to the Gorhambury Estate (to the east) is noted.

– Homes – the scenarios assume that it could be possible to provide for LHN without HGC (Scenario 3), but this is uncertain (noting the drawbacks to Scenario 3).

A related key issue is providing for Gypsy and Traveller accommodation needs, with HGC likely very important. Latest understanding, following a legal case in 2022, is that local plans should consider 'cultural' need as opposed to those meeting the 'planning definition', which relates to actively travelling.

– Transport – growth at this scale leads to clear opportunities, around minimising the need to travel and supporting modal shift, and there are certain inherent locational opportunities (support for A414 corridor aspirations, including HERT; proximity to employment; and also the Nickey Line), however, it is recognised that new communities would be quite distant from a town centre and a train station.

Whilst the appraisal has given detailed consideration to 'no HGC' scenarios, in light of the appraisal there is an argument to suggest that such scenarios are unreasonable, and attention might more usefully focus on scenarios that vary less in respect of HGC and more in respect of urban extensions elsewhere.

- **Sites involving land 'recommended' by the GB Review** (Scenarios 1, 3 and 4) – the strategic sites are all supported in wide-ranging respects, although there are a number of detailed issues that will require further consideration. The package of non-strategic sites includes a number of sites subject to constraint – e.g. biodiversity, historic environment, transport connectivity, safe and suitable access – which could result in a need to reduce housing yield or potentially consider the option of non-allocation. However, it is important to ensure a good supply of smaller sites from a housing delivery perspective.
- **Strategic sites involving land *not* 'recommended' by the GB Review** (Scenarios 3 and 4) – there is a distinction between A) East St Albans and West London Colney, which would deliver secondary schools; and B) North St Albans and NE Harpenden, which would deliver a primary school (and other significant infrastructure benefits, e.g. North St Albans should support significant enhancements to strategic cycle infrastructure). With regards to (A), there is strong support for these two sites, with the appraisal flagging few concerns, hence there is an argument to suggest that they should have been held constant across the RA growth scenarios, to enable a greater focus on other site / strategy options. Focusing on (B), NE Harpenden is slightly closer to its respective town centre and train station (~2km), and a secondary school (with capacity) is in very close proximity, but the site is not located on an A-road corridor. Both sites are associated with some landscape and heritage constraint.
- **Fallback strategic sites** (Scenario 3) – the three sites that replace HGC under Scenario 3 all give rise to significant concerns, most notably the option of an extended North St Albans strategic scheme. A South East St Albans urban extension has some merit, particularly in transport terms, and could feasibly be considered alongside strategic growth at North East London Colney (where there is also a need to consider the possibility of nearby growth in Hertsmere, as well as the Government permitted SRFI).

6.2.97 Finally, with regards to 'water', the appraisal conclusion reflects somewhat limited available evidence at the current time, particularly in terms of capacity / issues at sewage treatment works. The water companies and the Environment Agency will provide key evidence through the consultation.

7 The preferred approach

7.1.1 The aim here is to provide reasons for supporting the preferred scenarios in light of the appraisal of reasonable alternatives. The following text was provided to AECOM by SADC officers:

"The preferred scenario is **Scenario 4**, which the appraisal shows to perform very well relative to the alternatives. Scenario 4 gives rise to a degree of tension with certain sustainability objectives, as is inevitable in the context of a local plan, and it is recognised that there are certain arguments in favour of supporting an alternative approach, but Scenario 4 is judged to represent sustainable development on balance. There is good potential to address the identified tensions through policy (see the Draft Plan appraisal below), and adjustments can also be made to the spatial strategy subsequent to the current Regulation 18 consultation, drawing upon the latest evidence including consultation responses received."

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal of the current Draft Local Plan (as a whole).

8.1.2 In practice, the appraisal builds upon the appraisal of **Growth Scenario 4** presented in Section 6 with added consideration given to:

- Site allocations that are a 'constant' across the growth scenarios;[24] and
- Draft development management policies.

Appraisal methodology

8.1.3 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the Draft Plan, as a whole, before reaching an overall conclusion on significant effects.

8.1.4 Specifically, the regulatory requirement is to "identify, describe and evaluate" significant effects taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. effects can be short or long term, direct or indirect, and where:

- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan, under the presumption in favour of sustainable development and potentially Government intervention. Also, neighbouring local authorities would have to consider providing for St Albans' unmet housing need.
- The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. the District has a 2030 net zero target date, such that there is a need to achieve a rapid decarbonisation trajectory).

8.1.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the Draft Plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the Draft Plan will be implemented and the effect on particular 'receptors'.

8.1.6 Assumptions are discussed in the appraisal text where necessary. The appraisal aims to strike a balance between, on the one hand, a need to be systematic with, on the other hand, a need for conciseness and accessibility. There is a particular emphasis on conciseness, mindful of the concerns raised by the DLUHC Committee (August 2022), who emphasised a need to: *"streamline the current bureaucracy and overcomplication associated with… assessments."*

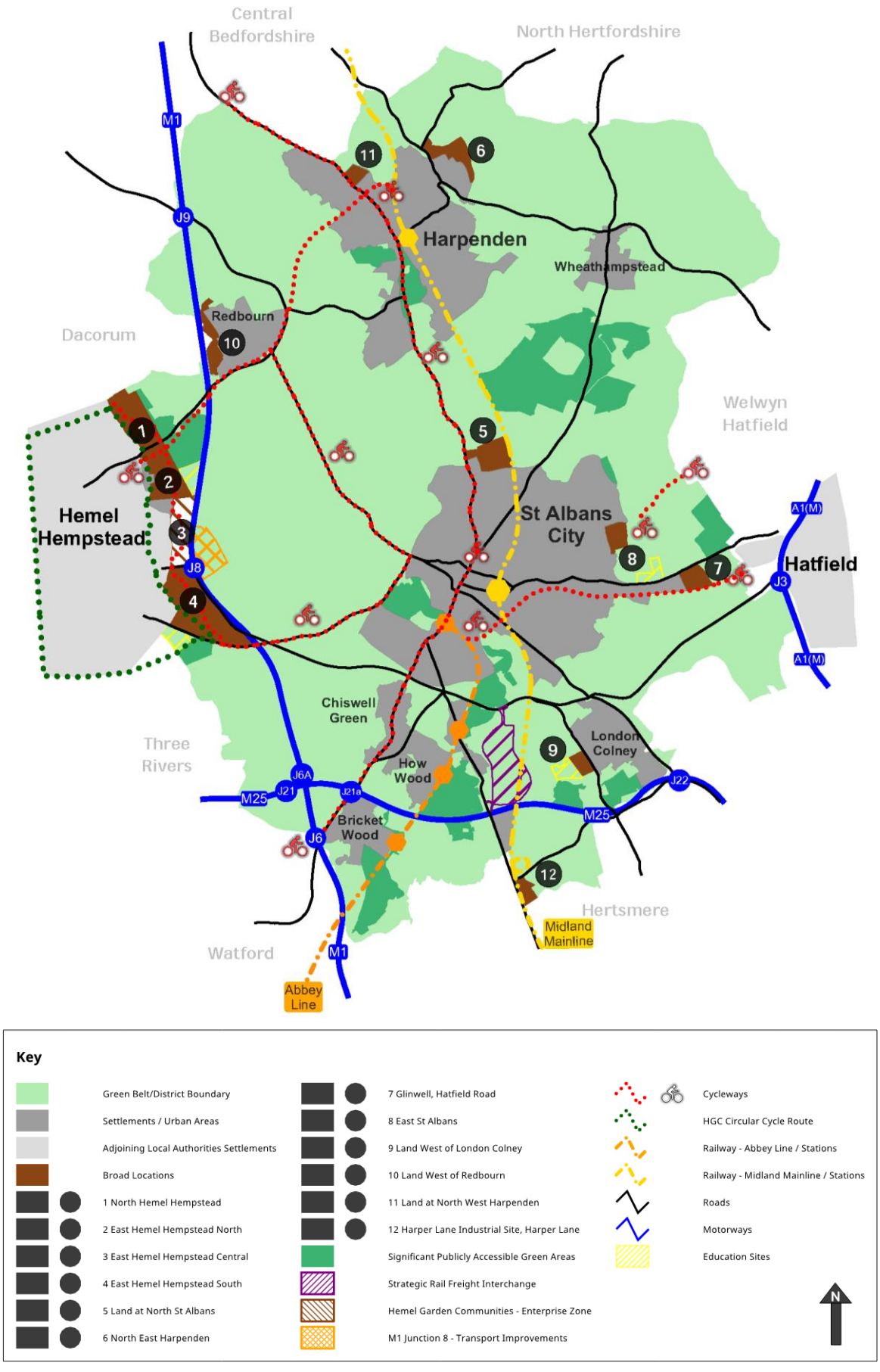
8.1.7 Specifically, the intention is to keep each appraisal to no more than one page. This approach is undertaken mindful that considerable detail is presented above in respect of reasonable alternatives (Sections 5 and 6), and mindful that there will be the potential to add further detail to the appraisal at the next stage (Regulation 19), when the Draft Plan and its supporting evidence base will be more fully formulated.

8.1.8 In practice, there is a particular focus on the proposals set out within the 'Spatial Strategy' section of the Draft Plan, including the Key Diagram (see Figure 8.1, below) and as supported by Appendix I (which presents proposed allocations) and Appendix II (which presents the proposed housing supply trajectory).

8.1.9 This approach is taken mindful that the Government's Planning Practice Guidance (PPG) is clear that SA should focus on significant effects, which translates as a need to focus primarily on the merits of the proposed approach to land supply (allocations and broad locations; see NPPF paragraph 68) to meet objectively assessed needs and wider plan objectives. There is inherently relatively limited potential to predict significant effects for district-wide thematic policy, mindful that significance is defined in the context of the plan as a whole. Equally, it is the proposed approach to land supply / spatial strategy that generates overwhelmingly greatest interest amongst local residents and wider stakeholders.

[24] Specifically: A) two proposed Green Belt PDL sites; and B) sites in the urban area (four HELAA sites, including two greenfield, plus 52 sites identified through the Urban Capacity Study).

***Figure 8.1**: The Key Diagram (Figure 1.2 from the Draft Local Plan)*



St Albans City & District Council

9 Appraisal of the Draft Plan

9.1 Introduction

9.1.1 Set out below is an appraisal of the Draft Local Plan as a whole. The appraisal takes the form of 13 narrative discussions – one for each of the topic headings that together comprise the SA framework.

N.B. efforts are made to minimise repetition of text presented in Section 6, such that the appraisal narratives presented below should be read alongside the appraisal of Scenario 4 in Section 6.

9.2 Accessibility (to community infrastructure)

9.2.1 The appraisal of RA growth scenarios (Section 6) finds the preferred scenario (**Scenario 4**) to perform very well relative to the alternatives. There is particular support for HGC and the four proposed strategic urban extensions involving land not 'recommended' for further consideration by the GB Review. With regards to strategic and non-strategic urban involving land 'recommended' by the GB Review, certain of the sites are supported from an accessibility perspective. However, in some instances benefits are of limited significance or somewhat uncertain, and numerous smaller sites will likely deliver little in the way of community infrastructure alongside new homes, and it could be that the in-combination / cumulative effect of arguably 'piecemeal' urban expansion results in pressure on existing community infrastructure. On the other hand, several settlements in the District have seen very low recent housing growth, and there are clear arguments for supporting housing growth with a view to supporting settlement viability and vitality.

9.2.2 With regards to proposed allocations that are not a focus of the appraisal in Section 6:

- **Green Belt PDL** - both proposed allocations are problematic in terms of the ability to easily walk or cycle to access local services and facilities (see further discussion in Appendix VI).
- **Urban greenfield sites (x2)** – these two sites are located in close proximity to one another and are in fairly close proximity to the historic centre of London Colney. It is noted that there will likely be a boost to access to local greenspace in the London Colney area as a result of the proposed strategic urban extension and the new country park set to be delivered alongside the Government permitted SRFI.
- **Urban PDL sites** – the package of proposed allocations has not been scrutinised in detail (there will be potential for further work subsequent to the current consultation), but it is noted that:
  - One site is currently in use as a Sainsbury (this use would be provided as part of redevelopment);
  - Two sites are in use as a church, and two more in use as a hall or social club;
  - Ten sites are in use as a car park (seven at St Albans, three at Harpenden); and
  - 27 sites (approximately half of the non-Green Belt allocations) are in use as a garage / garage block.

9.2.3 Finally, with regards to proposed **development management policies**, numerous policies are broadly supported, from an accessibility perspective, and no policies stand-out as leading to a significant degree of tension with accessibility objectives. The following points are noted:

- Policy LG2 (Support for Transformation of Hemel Hempstead) – it is important to recognise that a stated aim of HGC is to support regeneration and, indeed, transformation of Hemel as a whole. The policy explains: *"Developers and promoters will work closely with the Councils… to develop a coordinated approach to growth and infrastructure and deliver the transformation of Hemel Hempstead. Contributions will be sought to deliver Key Projects and infrastructure on and off-site."*
- St Albans city centre – a suite of three policies is proposed, which will be further scrutinised in light of consultation responses received. The question also arises as to whether there is a need for Harpenden town centre focused policy, albeit it is recognised that there is a Neighbourhood Plan in place.
- Chapter 7 – of the plan presents a suited of policies dealing with 'Community Infrastructure'. Most of the policies are fairly standard, but there is some local specificity, e.g. in respect of St Albans FC.

  N.B. on the matter of 'standard' policies, it should be noted that the Government's proposal (December 2022) is to establish National Development Management Policies.
- Policy TCR3 (Out-of-Centre Retail Parks) – supports the existing retail parks.

9.2.4 In conclusion, a **significant positive effect** is predicted on the baseline, accounting for established objectives. Growth is distributed in line with the settlement hierarchy, and there is a strong focus on strategic sites suited to delivering community infrastructure benefits alongside new homes. However, there is a need for further work to understand more precisely what can be achieved.

N.B. significant positive effects are predicted mindful that the baseline situation would likely involve piecemeal housing growth coming forward (likely to include 'planning by appeal') without strategic consideration being given to infrastructure issues / opportunities. See further discussion in Section 6.

9.3 Air and wider environmental quality

9.3.1 The appraisal of RA growth scenarios (Section 6) finds **Scenario 4** to perform well relative to the alternatives. HGC is supported, and there are no significant concerns regarding the four proposed strategic urban extensions involving land not 'recommended' for further consideration by the GB Review, albeit both sites at St Albans, where there is an air quality management area (AQMA), and both are beyond easy walking distance of the town centre. With regards to strategic and non-strategic urban extensions involving land 'recommended' by the GB Review, a number of the proposed urban extensions are beyond easy walking distance of a town / village centre and/or distant from bus corridors, plus several are in need of further work to confirm accessibility arranges and, in turn, the potential to support a modal shift to travel by active modes. A further consideration is cumulative effects at the scale of St Albans (where there is an AQMA) and potentially Harpenden (no AQMA, but concerns around traffic congestion).

9.3.2 With regards to proposed allocations that are not a focus of the appraisal in Section 6:

- **Green Belt PDL** – one of the proposed allocations is located adjacent to the A414, which is a busy dual carriageway. It is currently unclear how access will be achieved and, in turn, where it will be possible to deliver a greenspace buffer between new homes from the A414.
- **Urban PDL sites** – there will be a need for further scrutiny regarding issues relating to the St Albans AQMA and also development of land adjacent to main roads, railways or other sources of noise and potentially air pollution, e.g. land historically seen as appropriate for car parking.

9.3.3 Finally, with regards to proposed **development management policies**:

- Policy HW1 (Noise and Air Pollution) is the primary policy of note. It is a fairly standard policy; however, there is a degree of spatial specificity in respect of noise pollution, with the supporting text explaining: *"The DEFRA England Noise and Air Quality Viewer online shows three large noise corridors affecting the District: the M1, A1 and M25."* There are also other significant sources of noise pollution locally.
- It is not clear that any other proposed thematic policies give rise to a significant degree of tension with air quality objectives. There can be a degree of tension between air quality objectives, on the one hand, and objectives around ensuring high degrees of air tightness within developments (with a view to energy efficiency, i.e. taking a 'fabric first' approach to built environment decarbonisation) on the other. However, there is the potential to mitigate concerns through good ventilation, and none of the proposed policies within the Climate Change section of the plan give rise to any particular concern in this respect.

9.3.4 In conclusion, a broadly **neutral effect** is predicted on the baseline, accounting for established objectives. There is little reason to suggest that the proposed growth strategy will conflict with air quality objectives within an air quality management area (AQMA). The only local AQMA is located in St Albans, but concerns around traffic are potentially higher at Harpenden.

9.4 Biodiversity

9.4.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform broadly on a par with the alternatives (including one of the two lower growth scenarios). HGC is supported, and there are no significant concerns with the four proposed strategic urban extensions involving land not 'recommended' for further consideration by the GB Review. However, there is a concern in respect of the package of non-strategic urban extensions (all of which involve land 'recommended' for further consideration by the GB Review).

9.4.2 With regards to proposed allocations that are not a focus of the appraisal in Section 6:

- **Urban greenfield sites (x2)** – neither site is thought to be of particular biodiversity value, but there will be a need to confirm this through consultation.

- **Urban PDL sites** – there is a need to note that urban trees can be a significant constraint.

9.4.3 Finally, with regards to proposed **development management policies**:

- Policy NEB6 (Biodiversity) – it is noted that the proposal is in line with the national minimum requirement of 10% biodiversity net gain. The Guildford Local Plan Part 2 is an example of a recently adopted local plan where the proposal is to require 20% net gain. A number of other plans currently in draft are also proposing 20% biodiversity net gain, but understanding of the level of evidence needed to justify this approach, and the viability implications of taking this approach, is still evolving.
- Policy LG3 (Hemel Garden Communities Place Principles) – presents "a Green Network" as one of four key pillars, which is supported, from a biodiversity perspective. However, the policy proposals are somewhat high-level. Moving forward, it is recommended that work is undertaken to demonstrate that biodiversity issues are being addressed, and opportunities fully realised, through masterplanning, and also that consideration is given to requiring more than the national minimum 10% biodiversity net gain.

9.4.4 In conclusion, a broadly **neutral effect** is predicted on the baseline, accounting for established objectives. There is a case for predicting positive effects, given biodiversity net gain requirements and certain site-specific opportunities. However, a number of the proposed non-strategic allocations are subject to significant onsite or adjacent constraint (primarily locally designated habitat or non-designated priority habitat). Also, the proposal is to require only the national minimum 10% biodiversity net gain.

9.5 Climate change adaptation

9.5.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform broadly on a par with the alternatives (including one of the two lower growth scenarios). HGC is supported, and there are no significant concerns with the four proposed strategic urban extensions involving land not 'recommended' for further consideration by the GB Review. However, a number of the urban extensions that are 'recommended' for further consideration by the Green Belt Review' significantly intersect a flood risk zone, whether that be a fluvial flood zone or a higher risk surface water zone. Whilst there will be ample opportunity to masterplan sites, and potentially reduce site yields, in order to avoid and buffer flood zones and design-in sustainable drainage systems (SuDS), there is a need to take a sequential approach to avoiding flood risk, whereby issues are avoided in the first instance as far as possible.

9.5.2 With regards to proposed allocations comprising **urban PDL**, there has not been the opportunity to look in detail at which intersect a flood risk zone; however, it can be anticipated that a proportion will be associated with a degree of flood risk. In particular, it is noted that ten of the proposed allocations comprise a car park, and it is quite often the case that car park land is subject to a degree of flood risk. However, it is not uncommon to redevelop underused sites in urban areas subject to flood risk for residential or mixed-use development, given good potential to avoid and mitigate flood risk through building design and other measures. For example, concerns are reduced where the ground floor is used for retail.

9.5.3 Finally, with regards to proposed **development management policies**:

- Strategic Policy SP2 (Responding to the Climate Emergency) – includes a strong focus on climate change adaptation / resilience as well as climate change mitigation / decarbonisation.
- Policy NEB8 (Managing Flood Risk) is the primary policy of note. It is a fairly standard policy; however, it is noted that there is also tailored policy on Blue Infrastructure (NEB5) and also that the policy on Major Transport Schemes (TRA2) references flood risk (this can be a key issue, with roads often focused along river corridors). Strategic flood storage aimed at reducing downstream flood risk is feasibly something to consider further (the EA may wish to comment through the consultation).

9.5.4 In **conclusion**, a **moderate or uncertain negative effect** is predicted on the baseline, accounting for established objectives. Several sites are subject to a degree of flood risk constraint, albeit the overall proportion of sites / proposed supply subject to a degree of risk is not high, and there will be good potential to avoid or mitigate flood risk in practice, most notably through retaining land at risk of flooding as green space. It will be important to account for the consultation response received from the Environment Agency.

9.6 Climate change mitigation

9.6.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform broadly on a par with the alternatives (including one of the two lower growth scenarios). HGC is likely to represent a key decarbonisation opportunity, in terms of minimising per capita greenhouse emissions from the built environment (plus there are transport decarbonisation opportunities), and there could potentially be a degree of built environment decarbonisation opportunity at one or more of the proposed strategic urban extensions. However, there is considerable uncertainty, with it generally being the case, across all the allocations, that there is a need for further work, including by site promoters, to demonstrate the extent to which there is a particular site or concept-specific decarbonisation opportunity. It is crucially important that built environment decarbonisation opportunities are realised through spatial strategy / site selection, given the District's 2030 net zero target, which is extremely stretching and could well prove to be unachievable.

9.6.2 As discussed in Section 6, the opportunity will primarily relate to achieving standards of operational emissions beyond the standards required through Building Regulations ('regulated operational' emissions), and ideally 'onsite net zero' (i.e. net zero emissions without resorting to offsetting). However, there could well also be an opportunity to minimise non-operational emissions, which primarily translates as the embodied carbon in construction materials and the emissions associated with construction and demolition (also upkeep and necessary changes to a building over its lifetime, e.g. retrofitting for a new use). One key means of minimising non-operational emissions is support for modern methods of construction, and there is potentially a locally specific opportunity in this respect (discussed in Section 6).

9.6.3 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong viability, with a view to ensuring funding for decarbonisation measures (recognising that there are inevitably competing funding priorities, including affordable housing and infrastructure). This serves as an argument for providing for LHN in St Albans, as discussed in Section 6. However, there is also a need to recognise that certain of the proposed non-strategic allocations are associated with onsite uses and/or access constraints that could feasibly lead to abnormal development costs, which could then potentially have implications for development viability and the funds available for decarbonisation focused measures (alongside affordable housing, infrastructure, biodiversity net gain etc). It is also noted that HGC and West of Redbourn will need to contribute to the Chilterns Beechwoods Mitigation Strategy, including by ensuring access to SANG and making a financial contribution to SAMM.

9.6.4 With regards to proposed allocations comprising **urban PDL**, high density mixed used development can give rise to an opportunity to deliver heat network (i.e. heat pumps fed by a communal source of waste or ambient heat), and there can be a particular opportunity where redevelopment is concentrated and coordinated in a particular area (e.g. a town centre), but heat networks are technically challenging and costly to deliver, and it is not clear that there are any particular opportunities locally. It can also be the case that urban brownfield sites are associated with challenging development viability that restricts the potential to deliver low carbon / net zero focused measures, plus there is a need to consider the urban heat island effect and risk of overheating during future heat waves.

9.6.5 Finally, with regards to proposed **development management policies**:

- Strategic Policy SP2 (Responding to the Climate Emergency) – is very prominent within the Local Plan, which is supported. However, the policy is somewhat high-level, such that it is difficult to be sufficiently confident regarding the significance of the effect that it will have when applied to planning applications.
- Policy CE1 (Promoting Sustainable Design, Construction and Building Efficiency) – must give effect to Policy SP2, ensuring a suitably ambitious approach to built environment decarbonisation that is reflective of high development viability locally and the 2030 net zero target. The potential for local plans to require net zero development (in terms of regulated operational emissions), with a preference for onsite net zero if at all possible (i.e. without resorting to offsetting), is currently a live matter of debate nationally.[25]

[25] The Bath and Northeast Somerset (BANES) Partial Update (2023) was the first to include a net zero policy requirement. A press release explains the BANES policy approach, which can be described as "energy based" (as per all the following examples). The BANES Partial Update was followed by the Cornwall Climate Change DPD (see paragraph 172 of the Inspector's Report; also paragraphs 165 to 168). Also, two recent draft local plans proposing net zero regulated emissions (onsite if possible) are Stafford and Wiltshire. However, conversely, a net zero requirement (onsite if possible) was removed by the Inspector's Report for the Salt Cross Area Action Plan in early 2023. This was also recently the case for the Lancaster Local Plan (see examination document EX/INS/10). Similarly, in the case for the Bracknell Forest Local Plan, the Inspectors' letter concluded *"no local circumstances and substantive evidence"* in respect of the proposed net zero policy. Most recently, the West Berkshire Local Plan Inspector has questioned whether the Council's proposed net zero requirement is justified.

The proposed approach here is to rely on the use of a nationally recognised certification schemes, such as Passivhaus, which is not uncommon. It will be important to ensure that the final policy approach is clear and understandable to the interested public, in support of effective monitoring / scrutiny and evaluation (recalling the 2030 net zero target).

- Strategic Policy SP1 (Spatial Strategy) states that the Local Plan supports *"renewable energy provision, including large scale solar power generation at East Hemel…"* However, the Local Plan could feasibly do more to set a policy framework to guide planning applications for solar farms, mindful of the following "key message" set out within the Climate Change Committee's 2023 Report to Parliament:

  "Planning policy needs radical reform to support Net Zero. In a range of areas, there is now a danger that the rapid deployment of infrastructure required by the Net Zero transition is stymied or delayed by restrictive planning rules."

  The following requirement within the policy also warrants scrutiny: *"Broad Locations will have to provide a comprehensive approach to renewable energy such as wind and solar."* It is very unlikely that wind turbines will be integrated as part of strategic allocations; and if the intention is to support strategic solar PV that directly feeds developments (alongside battery storage), as opposed to feeding the national grid, then this could potentially be stated more clearly.

- Policy LG3 (Hemel Garden Communities Place Principles) – whilst scheme-specific information is limited and largely high level, there is a clear and strong commitment to: *"A fabric first approach contributing towards the delivery of net zero homes."* Also, a significant opportunity relates to delivering extensive rooftop solar PV (also potentially solar car ports) as part of the 55ha employment allocation.

9.6.6 In conclusion, a **neutral effect** is predicted on the baseline, accounting for established objectives, in particular accounting for the District's ambition of achieving net zero by 2030. There is a good focus of growth at strategic sites, which may lead to a built environment decarbonisation opportunity, and it is noted that decarbonisation will be considered through Supplementary Planning Documents (SPDs), recognising that this is a fast-evolving policy area. The plan should lead to an improvement on the baseline situation (which is one whereby growth continues to come forward but in a less well-planned way), but there is also a need to account for established objectives and targets, hence 'neutral effects' are predicted. There is a high bar to reach before predicting positive effects of any significance, given the urgency of the issue.

9.7 Communities and health

9.7.1 The appraisal of RA growth scenarios (Section 6) finds the preferred scenario (**Scenario 4**) to perform very well relative to the alternatives. There is particular support for HGC recognising that growth at scale can, in theory, lead to an opportunity, particularly if delivered in line with garden community principles, as is the intention for HGC. However, it is recognised that opportunities can often be missed in practice. There is support, from a communities perspective, for directing growth strongly in accordance with the findings of the Green Belt Review and, whilst certain of the four proposed strategic urban extensions involving land not 'recommended' for further consideration by the GB Review are associated with a degree of local opposition, there is a need to consider sites in context, i.e. mindful that non-allocation would result in increased pressure for growth elsewhere.

9.7.2 With regards to proposed allocations that are not a focus of the appraisal in Section 6 (Green Belt PDL, urban greenfield sites (x2) and urban PDL sites), it is not clear that any sites are associated with clear 'communities issues over-and-above those discussed under other headings. There is a clear support locally for maximising the supply of new homes from sites other than greenfield Green Belt.

9.7.3 Finally, with regards to proposed **development management policies**, numerous policies are broadly supported, from a communities perspective, and no policies stand-out as leading to a significant degree of tension with communities objectives. The following points are noted:

- Policy LG3 (Hemel Garden Communities Place Principles) – presents four 'pillars' under which policy criteria are then presented, and one of the pillars deals with 'engaged communities'. In this respect, it is also noted that Policy LG1 (Broad Locations) requires that at these sites (of which there are 12 in total) there is a need to: *"Establish a Community Partnership Management Organisation with sufficient assets to provide sustainable management of community facilities and/or open spaces."*

- Policy LG1 (Broad Locations) also requires the planting of at least 1 semi-mature tree for each dwelling. There is a need to confirm whether a similar requirement applies to smaller allocations.

The following requirement for broad locations (Policy LG1) is also supported, but there will be a need to consider adding spatial specificity: *"Provide new or provide contributions to enhance existing strategic, local and recreational public open space, including managed woodland and ecological network links… Positively relate and integrate the development to the surrounding buildings and landscape."*

- Strategic Policy SP13 (Health and Wellbeing) sets out that: *"Large developments (100+ homes) must be provided with appropriate public open space including children's playground(s) on the basis of 1.2 ha per 1,000 persons, whilst smaller sites (30+ homes with two bedrooms) must provide toddler play spaces on the basis of 3 sq. metres for every 5 homes."*
- Policy NEB 11 (Green Space Standards and New Green Space Provision) – then sets out detailed standards, with a requirement for "full provision" at sites involving greater than 100 homes.
- There is a well-targeted / locally specific approach to green and blue infrastructure designations set out across the following policies: NEB 2 (Local Green Spaces); NEB 3 (Non-Designated Local Green Space); NEB 4 (Significant Publicly Accessible Green Areas); and NEB 5 (Blue Infrastructure).
- Policy LG6 (Green Belt Compensatory Improvements) - notably requires that Green Belt proposals include a Green Belt compensation strategy. The policy specifies key issues to be addressed.
- Chapter 12 of the plan document presents a series of eight policies on High Quality Design. Policy DES6 (Building Heights) is of note, setting policy for A) proposals within the defined Building Heights Control Zone; and B) proposals elsewhere. The question of taking a spatially targeted approach to building heights might be given further consideration, e.g. as per the emerging Sevenoaks Local Plan.

9.7.4 In conclusion, a **moderate or uncertain positive effect** is predicted on the baseline, accounting for established objectives. Whilst there may be concerns amongst some members of the local community regarding the negative impacts of housing growth, there is little reason to suggest particular issues constraining St Albans relative to potential growth locations in the sub-region. There is clear support for HGC, as a garden community and a scheme with a focus on achieving wide-ranging objectives for Hemel Hempstead, and the HGC programme is progressing relatively well outside of the St Albans Local Plan process, albeit with some opposition. With regards to other Green Belt allocations, several give rise to 'communities' related issues, which will be explored further in light of consultation responses received.

9.7.5 A final key consideration is simply the need to adopt a local plan in order to avoid development coming forward in a less well-planned manner, under the presumption in favour of sustainable development or otherwise in a manner that is outside of local control (St Albans is at risk of Government intervention).

9.8 Economy and employment

9.8.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform very well relative to the alternatives. There is particular support for HGC, as it will deliver a major new strategic employment location. The appraisal of RA growth scenarios in Section 6 assumes that the employment scheme could be delivered without the wider HGC programme being delivered in full, but in practice there is some uncertainty. With regards to the wider package of proposed allocations, none are expected to deliver significant new employment land, but there is a strong economic argument support for delivering new homes locally, particularly smaller and more affordable homes suited to those wishing to work locally.

9.8.2 With regards to **development management policy**, the key point to note is that Strategic Policy SP5 (Employment and the Local Economy), in addition to dealing with new supply, identifies Protected Employment Areas (in combination with Policy EMP1) to be retained for appropriate business uses and supports *"new businesses, business growth, and inward investment."*

9.8.3 In conclusion, a **significant positive effect** is predicted on the baseline, mindful of established objectives. There would be an oversupply of employment land locally, as measured against the requirement assigned to St Albans by the South West Herts Economic Update (2019; N.B. an update is forthcoming). However, this is appropriate given the potential for unmet need from elsewhere in South West Herts, and because East of Hemel Hempstead is a suitable location for new strategic employment land, given transport connectivity and Enterprise Zone designation. East of Hemel will support Herts IQ as a business location (described as an "ideal for businesses in agri-tech, sustainable construction and clean tech") and, in turn, support a regionally important cluster alongside Rothamsted Research to the north and Building Research Establishment (BRE) to the south. Also, it is important to recognise that a key aim of HGC is to support regeneration of Hemel town centre and to support employment within the Hemel urban area.

9.9 Historic environment

9.9.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform very well relative to the alternatives, although one of the two lower growth scenarios is also found to perform well. HGC appears to represent a good opportunity to deliver new homes whilst minimising pressure on the historic environment. However, several other proposed allocations are subject to notable constraint (including several at Harpenden), and the District is overall subject to a relatively high degree of constraint in the sub-regional context. Particular issues and potential impacts are discussed further in Section 6.

9.9.2 With regards to **development management policy**:

- Policy LG3 (HGC Place Principles) – does not reference the historic environment.
- Policy TCR5 (St Albans City Centre Culture, Heritage, Civic Pride and the Leisure Economy) is broadly supported, although there is only criterion on heritage, dealing with a very specific matter."
- Policy NEB 10 (Landscape and Design) – seeks to ensure a focus on responding to established landscape character, including from a historic environment perspective.
- Chapter 11 of the plan presents a series of policies dealing with the historic environment. These are fairly standard policies, although there is some tailoring to the St Albans context, including the policy on conservation areas.
- No development management policies can be identified with the potential to result in a significant negative effect (in the context of the Local Plan).

9.9.3 In conclusion, a **broadly neutral effect** is predicted on the baseline, mindful of established objectives. Numerous sites are subject to a degree of constraint, but there is typically good potential to avoid and mitigate impacts through SPDs and at the development management stage, and a robust policy framework is proposed in support of this.

9.10 Homes

9.10.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform very well relative to the alternatives.

9.10.2 There is clear support for setting the housing requirement at LHN (15,096) for the plan period as whole, and with a sufficient supply buffer, such that there is confidence in the ability to meet the housing requirement / provide for LHN in practice. This represents a considerable step-change in respect of response to the housing crisis, with wide ranging benefits such as for health and wellbeing, communities and the local economy (and, in turn, reducing out-commuting). With the Local Plan in place it will be possible to require higher density developments comprising smaller homes than would otherwise be delivered by the market, suited to first time buyers, young families and downsizers. Also, there will be a step-change in affordable housing delivery, with several hundred delivered every year (with a tenure mix in line with policy) as opposed to fewer than 100, which is the typical rate of delivery.

9.10.3 However, it is important to note that the proposal is for the requirement to be 'stepped', such that it is below the average for the plan period (888 dpa) in the early years (710 dpa) and then higher in the latter years (as high as 1,200 dpa when HGC is delivering at pace). This is not supported from a pure 'housing' perspective, because housing needs are an immediate priority (e.g. given an affordability ratio of 18.4% and affordable housing needs arguably in excess of 800 homes per annum). However, it is recognised that it is likely justified given reliance on HGC and limited realistic small site options, particularly on the basis of the evidence provided by the HELAA, Green Belt Review and the Urban Capacity Study.

9.10.4 Aside from growth quantum and trajectory, there is also a need to consider the mix of proposed supply. Overall there is considered to be a good mix - in terms of site size, type, location and timetable for development - which is supported from a perspective of minimising delivery risk, and it is also noted that quite detailed work has been completed regarding setting out the anticipated supply trajectory. However, there are numerous sites where further work is needed to confirm deliverability, delivery timescales, yield and viability (with implications for affordable housing delivery). This is naturally the case for HGC, where the number of homes anticipated to come forward in the plan period is inherently subject to some change due to its scale, but there are also a number of non-strategic site options (i.e. sites 'recommended' by the GB Review) where the potential to achieve suitable and safe access is currently unclear and/or there is a need for further work to explore how to address constraints, which could potentially result in the need to

reduce the assumed housing yield. There will also be a need for further scrutiny of the anticipated yield from sites identified through the Urban Capacity Study, mindful that the proposed supply (775 homes) is so much higher than the supply of homes identified at brownfield urban sites through the call for sites / HELAA process (15 homes). It will undoubtedly be the case that certain of the sites identified through the Urban Capacity Study are associated with issues with a bearing on the ability to bring forward a planning application, such as complex land ownership, existing leases / high existing use value and dependencies with other sites (e.g. due to a need to relocate an existing use, such as parking).[26]

9.10.5 It is crucially important (from a wide-ranging sustainability perspective, as opposed to solely from a housing perspective) that the Local Plan supply is sufficient to meet the housing requirement in practice over the course of the plan period, accounting for wide-ranging delivery risks and mindful that the proposed housing requirement is a step-change from recent housing delivery rates.

9.10.6 Final considerations relate to:

- **Housing Mix** – Policy HOU1 (Housing Mix) specifies the housing mix required at sites involving more than 10 homes, with a breakdown by both size and tenure, including a distinction between affordable home ownership and affordable rent tenures.
- **Affordable housing** – Policy HOU2 (Affordable Housing) requires affordable housing on sites involving 10 or more homes, or where the site has an area of 0.5 hectares or more. At qualifying sites the requirement is then for 40% of homes as on-site affordable housing, with a tenure mix of: 30% social rented; 30% affordable rented and 40% affordable home ownership, which includes 25% of all affordable housing as First Homes. The policy also requires a design approach where affordable housing is indistinguishable in appearance from market housing on site.
- **Specialist accommodation** – Policy HOU4 (Specialist Housing) sets out policy in support of specialist housing to meet the needs of older people and people with disabilities. The supporting text explains: "

  "Specialist housing is allocated at sites listed in Appendix 1. Planning applications by specialist housing providers on ad hoc sites and on HCC land will deliver additional units of accommodation across the Plan period. Taken together, these sources should meet demand for specialist housing."
- **Gypsy and Traveller accommodation needs** – the proposal is to allocate two deliver two new sites within HGC for a total of 30 – 40 pitches. This figure falls significantly below the level of need discussed within the Gypsy and Traveller Accommodation Assessment (2019), particularly if account is taken of the accommodation needs of those who do not actively travel but nonetheless seek accommodation on a site locally. The plan document states: *"Further evidence may be required to establish an up to date figure for needs that will have to be further addressed as the draft Plan evolves."*

9.10.7 In conclusion, a **moderate or uncertain positive effect** is predicted on the baseline, accounting for established objectives. The plan represents a considerable step-change, in terms of addressing housing and wider accommodation needs locally, in the context of a national housing crisis, but there is a need for further work, including around deliverability and providing for Gypsy and Traveller accommodation needs.

9.11 Land, soils and other resources

9.11.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform broadly on a par with the alternatives (including both lower growth scenarios). It is not clear that HGC is particularly constrained in terms of high quality agricultural land (in the sub-regional context) and, of the other proposed strategic urban extensions, only one has been surveyed in detail, namely North St Albans, which is found to comprise primarily grade 3a quality land, i.e. land that is classed as best and most versatile. Also, land adjacent to the east of 'East St Albans' has been surveyed and found to comprise a mix of grades 2, 3a and 3b.

9.11.2 With regards to **development management policy**, one point to note is that Policy LG3 (Hemel Garden Communities Place Principles) requires: *"a Household Waste Recycling and Council Depot facilities to meet the needs of new and existing communities."* It is also noted that there is no policy dealing with minerals safeguarding areas (see discussion in Section 6).

[26] The Chesham Neighbourhood Plan is notably seeking to take an ambitious approach to maximising deliverable/developable supply (see NPPF para 68) from the urban area, with a view to minimising greenfield; see www.chesham.gov.uk/NP.

9.11.3 In conclusion, a **broadly neutral effect** is predicted on the baseline, mindful of established objectives. Whilst there would be significant loss of productive agricultural land, it seems likely that the majority would be land that is *not* classed as best and most versatile (BMV). Also, it is important to recognise that best use is made of brownfield development opportunities. Further discussion is presented in Section 6 (specifically, see discussion of Scenario 4).

9.12 Landscape

9.12.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform well relative to the alternatives; however, all of the alternative scenarios appraised give rise to a notable degree of concern. There is tentative support for HGC from a landscape perspective, albeit this is raised land in proximity to the Chilterns AONB. Furthermore, there is clear support for directing growth strongly in line with the findings of the Green Belt Review (2023). With regards to the four proposed strategic urban extensions involving land not recommended for further consideration by the Green Belt Review, all are associated with landscape sensitivities (perhaps most notably North East Harpenden, and perhaps less so East of St Albans), but the significance of the sensitivities / impacts is potentially limited.

9.12.2 With regards to **development management policy**, numerous key policies have already been discussed under other headings. Focusing on Policy Strategic Policy SP1 (A Spatial Strategy for St Albans District) notable requirements are around: making the best use of land in urban areas; significantly increased tree cover; and *"Green Belt compensatory improvements - including significant new country parks, better access to the countryside via new and improved rights of way, new and improved habitat connectivity."*

9.12.3 In conclusion, a **broadly neutral effect** is predicted on the baseline, mindful of established objectives. A strong framework of development management policies is proposed with landscape and Green Belt sensitivities in mind (which is why neutral effects are predicted in respect of the Draft Plan as a whole, in contrast to the negative effects predicted in respect of Growth Scenario 4). However, the fact remains there are clear sensitivities. It will be important that plan-finalisation is informed by consultation responses received and further work, e.g. in respect of scheme layouts, including landscape / greenspace buffers and robust Green Belt boundaries.

9.13 Transport

9.13.1 The appraisal of RA growth scenarios finds **Scenario 4** to perform very well relative to the alternatives.

9.13.2 Directing growth within the District and sub-regionally so as to align with transport objectives is crucially important in terms of climate change mitigation and wide-ranging other sustainability objectives. Transport is also a key priority amongst local residents, with the option of focusing growth along transport corridors found to perform strongly through the recent SW Herts JSP consultation, and the option of 'growing the best-connected places' also performing well. In transport terms there is support for broad support for:

- Providing for LHN in full - albeit there are inherent transport challenges affecting the District, particularly road traffic, with considerable variability in terms of connectivity to the strategic road network.
- Distributing growth broadly in accordance with the settlement hierarchy - with 33% growth over the plan period set to occur at St Albans, 31% at Hemel, 14% at Harpenden and 20% at lower order settlements (with no one settlement set to receive more than 5% of growth).
- Hemel Garden Communities - particularly because of the opportunities afforded by the scale of the scheme, although there are also certain locational opportunities (support for A414 upgrade aspirations; collocating new homes and employment growth; and extending the Nickey Line to Hemel town centre and train station). There is, however, a need to recall distance to a town centre and train station.

9.13.3 The proposed strategic urban extensions also most perform quite well in transport terms, with certain sites well-linked to bus services and/or cycle infrastructure (e.g. notably North St Albans and Glinwell, east of St Albans, which is otherwise not ideally located in transport terms, being near equidistant between St Albans and Hatfield town centres / railway stations). There is a very good opportunity for several of the strategic urban extensions to support upgrades to priority cycle routes, as set out within the recent Draft St Albans Local Cycling and Walking Implementation Plan (LCWIP). Perhaps most notably, there is an opportunity for growth to support upgrades to cycling infrastructure along the A1081 between St Albans and the north of Harpenden (cost up to £15m), and there is also potentially an opportunity to deliver a cycle route along the A4147 between St Albans and Hemel Hempstead.

9.13.4 Another consideration, in respect of the proposed strategic urban extensions, is that support for a secondary school at London Colney (delivered alongside a 400 home urban extension, which is a-typical, in that it is typically the case that many more homes are required) is strongly supported in terms of minimising peak time traffic congestion in the area.

9.13.5 With regards to the package of proposed non-strategic allocations, several present challenges in transport terms, e.g. sites at the southern extent of Harpenden and a site at Gustard Wood, which is a lower order settlement. Also, there is a need to consider in-combination / cumulative effects on traffic congestion, resulting from both strategic and non-strategic sites, and recognising traffic flows between settlements. Further work might be undertaken to ensure that growth is directed so as to best align with transport objectives, and it will be important to carefully consider the role of transport modelling (which can be a major undertaking with high costs and implications for the plan-making timetable).

9.13.6 With regards to **development management policy**, numerous key policies have already been discussed under other headings. Further considerations include:

- Policy LG3 (Hemel Garden Communities Place Principles) – seeks to ensure measurable targets, requiring: "Interventions to achieve a target of 60% of all journeys within the new Garden Town communities and 40% of all journeys across the existing town of Hemel Hempstead, to be undertaken by sustainable modes by 2050."
- Strategic Policy SP8 (Transport Strategy) – is a fairly standard policy, however, the approach of supporting a network of 'local hubs' appears to be tailored to the local context. The policy requires:

  "Supporting a network of local hubs at suitable locations such as railway stations and co-located in city, town and district centres where appropriate. The scale and nature of proposals must be appropriate to the size and function of the centre or station and proposals should contribute towards the vitality of a centre. A local hub should support sustainable travel and can include: a local bus service, car club facilities, bike repair service, e-bike charging, bike share facilities, ride hailing & ride sharing stop, real time and digital travel information, wifi and phone charging, parcel delivery storage lockers and public realm improvements. Local hubs should be supported by online presence and digital functionality."

- TRA4 (Parking) – has not been scrutinised in detail (further work could be warranted prior to plan finalisation, given the importance of parking strategy for the achievement of wide-ranging objectives, including in respect of bus services and safe cycling), but it is noted that in summary the policy requires:
  - Meet car parking standards as set out in Appendix 3, taking into account the accessibility of the site to public transport and the nature of the use;
  - Provide at least the cycle parking standards in Appendix 3; and
  - Provide at least the disabled and inclusive parking standards in Appendix 3.

9.13.7 In conclusion, a **moderate or uncertain positive effect** is predicted on the baseline, accounting for established objectives. It should be possible to predict significant positive effects prior to plan finalisation after having accounted for consultation responses received, notably from the County Council. In particular, in light of consultation responses it should be possible to confirm the extent to which the Local Plan aligns with long term strategic transport objectives for the sub-region and wider region.

9.14 Water

9.14.1 The appraisal of RA growth scenarios in Section 6 is unable to reach a firm conclusion on the merits of the preferred scenario (**Scenario 4**) relative to the alternatives, in light of the available evidence. There will be a need to revisit the appraisal in light of the consultation response received from the Environment Agency, Affinity Water (water supply) and Thames Water (wastewater).

9.14.2 There is theoretical support for setting the housing requirement at LHN, with a view to early and effective planning for water infrastructure and the wider water environment (as opposed to generating unmet need that will then need to be provided for at locations unknown within a constrained sub-region). However, it could potentially be the case that there are particular constraints affecting St Albans, in terms of water quality and/or water resources. In particular, whilst early indications from Thames Water are that wastewater treatment capacity is not a constraint to the emerging growth strategy, this is a matter to be examined in further detail (or, at least, there is a need for a watching brief). The majority of wastewater from the St Albans region is treated at the Maple Lodge STW, south of Rickmansworth, and the treatment

works is already operating at close to capacity and sometimes gets overwhelmed causing overflows (23 times for a total of 204 hours in 2022, as shown here). The Maple Lodge catchment is very large and covers multiple local authorities, so it is important that growth in St Albans is aligned with growth in the rest of the catchment area to avoid worsening capacity issues at the STW.

9.14.3 With regards to **development management policy**:

- Strategic Policy SP9 (Utilities Infrastructure) states that: *"The Council requires and supports the programmed delivery of utilities infrastructure within the District to meet identified needs relating to water, wastewater, foul drainage, sewage treatment.... Early planning for full and effective provision of these utilities will be required..."* It is important to ensure that a suitably proactive approach is taken to strategic planning for wastewater treatment in particular, as opposed to dealing with matters at the DM stage.
- Policy CE1 (Promoting Sustainable Design, Construction and Building Efficiency) – requires: *"… water conservation, greywater recycling and storage facilities to reduce household water consumption to under 110 litres per person per day including external water use…"* This is the 'optional' higher standard allowed under Building Regulations, and is common practice, whilst some authorities nationally seek to justify a more stringent standard of 85 litres per person per day, for example the Chichester Local Plan (specifically in the northern part of Chichester District, where there is a need to demonstrate water neutrality). However, there are significant development viability implications.

9.14.4 In conclusion, a **moderate or uncertain negative effect** is predicted on the baseline, accounting for established objectives. It will be possible to revisit this conclusion in light of consultation responses.

9.15 Conclusions

9.15.1 The Draft Plan appraisal presented above seeks to build upon the appraisal of Growth Scenario 4 presented in Section 6. For all but one sustainability topic the appraisal conclusion for the Draft Plan (as a whole) is *as per* the conclusion reached for Scenario 4, with the one exception being the conclusion reached under the 'Landscape' heading. Here it is considered appropriate to conclude 'neutral' effects, rather than 'moderate or uncertain negative effects', after having taken account of the proposed framework of development management policies presented across the plan, and also mindful of the draft site-specific requirements presented within the site allocations that are collated in Appendix I of the plan.

9.15.2 It should also be noted that appraisal findings in respect of the proposed spatial strategy / package of proposed allocations are presented more fully in Section 6 (in comparison to within this current section). This is with a view to minimising repetition of text and reflects a view that there is particular value to considering the merits of the emerging proposed approach in the context of reasonable alternatives.

9.15.3 Overall, the appraisal predicts mixed effects (as is typically the case with local plans). In summary:

- **Positive effects** are predicted under five topics (Accessibility, Communities, Economy/employment, Homes and Transport), and in two cases (Accessibility and Economy/employment) it is possible to conclude that positive effects will be 'significant'.
- **Negative effects** are predicted under two topics (Land/soils and Water), although in neither case is it possible to conclude that negative effects will be 'significant'.
- **Neutral effects** are predicted under the remaining topic headings. In all cases there are a range of important issues and impacts to consider, but it is not possible to reach a clear conclusion in respect of overall effects, either positive or negative. It is recognised that the 'Landscape' conclusion is marginal and specifically that there is an argument for predicting negative effects. Neutral effects are predicted on balance, mindful that the baseline scenario is one whereby development continues to come forward and in a relatively unplanned manner under the presumption in favour of development.

9.15.4 Issues and tensions with sustainability objectives identified through the appraisal should be taken into account as part of the process of updating the plan (and reasonable alternatives) subsequent to the current consultation, alongside consultation responses received and other new/updated evidence.

9.15.5 The appraisal also makes a number of specific recommendations, which should be considered. However, it is recognised that the recommendations are made 'in silos', whilst the Council must reach decisions on balance and from a perspective of ensuring whole plan viability. It is easy for the SA to recommend more stringent policy with a view to improving the performance of the plan in respect of any given sustainability objective, but the implication could be a need for a less stringent policy elsewhere in the plan.

Cumulative effects

9.15.6 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects. The following bullet points cover some key considerations:

- **Housing needs** – progressing the St Albans Local Plan and providing for local housing needs (LHN) in full is strongly supported from a 'larger-than-local' perspective. Support for HGC is likely to be of crucial importance for the Dacorum Local Plan, and if the St Albans and Dacorum Local Plans are able to progress then the South West Herts JSP will be well placed to make progress and plan for longer term needs (alongside infrastructure). There is also a need to account for the emerging Hertsmere Local Plan, with a previous version having proposed a new settlement to the southeast of London Colney. Certainty in respect of the St Albans Local Plan could assist with progressing the Hertsmere Local Plan.
- **The economy** – the proposed strategic employment allocation to the east of Hemel Hempstead is very strongly supported from a perspective of meeting employment land needs / realising economic growth and productivity objectives across the South West Herts sub-region.
- **Transport corridors** – several strategic transport corridors pass through the area, but of particular note is the A414 corridor. The growth strategy should support aspirations for transformational change, with major enhancements supporting objectives for settlements / growth areas between Hemel Hempstead / Watford and Harlow (where there is a committed Garden Town). There is also a clear need to consider the M1 and, in this respect, there will be a need to take careful account of the consultation response received from National Highways (who might wish to comment on the reasonable growth scenarios).
- **Internationally important biodiversity sites** – the key consideration is the Ashridge Woods and Commons SSSI component of the Chilterns Beechwoods SAC. Were HGC not to progress then it would likely prove very difficult for Dacorum to provide for housing needs alongside sufficient SANG.
- **The Chilterns AONB** – HGC is in proximity, but it is not clear that there are particular concerns (the Chilterns Conservation Board will comment further). Again, were HGC not to progress then there could be increased pressure on the AONB through the Dacorum Local Plan. There is also a need to note the Chilterns AONB boundary review, which could feasibly see the AONB extended into St Albans District.
- **Landscape scale nature recovery** – key cross-border growth-related opportunities are potentially in the east of the District (i.e. the sensitive landscape gap between St Albans and Hatfield, albeit recognising that the emerging Welwyn Hatfield Local Plan proposes little growth in this area), the south / southeast of the District (mindful of the proposed series of new country parks set to be delivered alongside the Government permitted SRFI) and in the Bricket Wood area, given Bricket Wood Common SSSI and the River Colne corridor, and recognising close links to Watford).

  A Hertfordshire Local Nature Recovery Strategy is emerging and could potentially feed-in prior to finalisation of the St Albans Local Plan. If this is the case, it will be important to ensure that the Local Plan is taking sufficient steps to support strategic / larger-than-local nature recovery objectives.
- **Agricultural land** – self-sufficiency of food production is increasingly a key national consideration. Overall, it is not clear that St Albans is particularly constrained in the national context, hence there is support for providing for housing needs in full. For example, looking at Herts and Essex, the national dataset shows SW Herts to be mostly grade 3 quality land, whilst within NEC Herts there is significant grade 2 quality land, and West Essex is associated with very widespread grade 2 quality land.
- **Water resources** – this is a key larger-than-local issue, including given the very large catchment draining to Maple Lodge Sewage Treatment Works. There is a need for early certainty in respect of how growth is set to be distributed across the catchment.

Part 3: What are the next steps?

10 Plan finalisation

Publication of the Proposed Submission Local Plan

10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the Local Plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.

10.1.2 The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

10.1.3 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.

10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

10.1.5 Once found to be 'sound' the Local Plan will be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

11.1.1 Within the SA Report (N.B. this is not the SA Report, but rather an "Interim" SA Report), the requirement is to present "measures envisaged concerning monitoring".

11.1.2 The question of an appropriate monitoring framework will be revisited prior to plan finalisation, but it is suggested that monitoring might cover:

- Hemel Garden Communities – a bespoke monitoring framework could be established.
- Biodiversity – there will be a need to monitor whether implementation of the biodiversity net gain regime through planning applications aligns with the emerging Hertfordshire Local Nature Recovery Strategy, including mindful of numerous proposed allocations having a degree of onsite or adjacent constraint.
- Climate change mitigation – there is a need for clear criteria to enable scrutiny of the extent to which developments exceed the minimum emissions standards set out in the Building Regulations.
- Homes – a detailed monitoring framework is in place, but could potentially be enhanced, for example with figures broken down by settlement.
- Transport – there is a clear need for targeted detailed monitoring. As well as road traffic, there is a need for improved data on bus patronage and use of cycle routes.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

N.B. this is not the SA Report, but nonetheless aims to present the information required of the SA Report.

***Table A**: Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements*

	Questions answered		As per regulations… the SA Report must include…
Introduction	What's the plan seeking to achieve?		• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	• Relevant environmental protection objectives, established at international or national level • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • The environmental characteristics of areas likely to be significantly affected • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	• Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) • The likely significant effects associated with alternatives • Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		• The likely significant effects associated with the draft plan • The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		• A description of the monitoring measures envisaged

***Table B**: Interpreting Schedule 2 and linking the interpretation to the report structure*

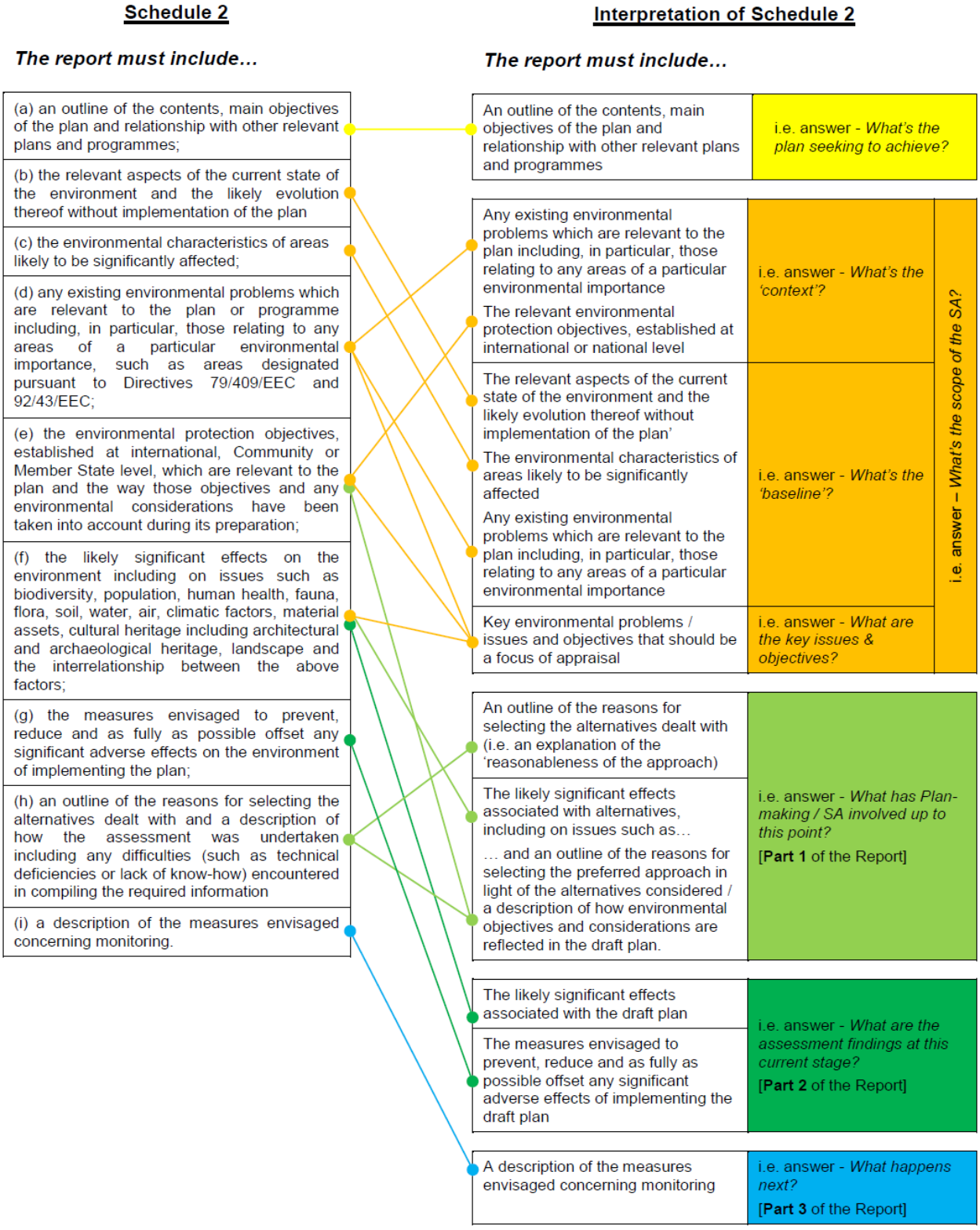


***Table C**: 'Checklist' of how and where (within this report) regulatory requirements are reflected.*

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form. Key issues are also discussed within Appendix II.
c) The environmental characteristics of areas likely to be significantly affected;	
d) … environmental problems which are relevant… …areas of a particular environmental importance…;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. Also, see Appendices II and III. With regards to explaining *"how… considerations have been taken into account"*, Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Sections 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) … measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary… under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities… and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside the Draft Plan in order to inform consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (as discussed in Section 10).

Appendix II: The SA scope

Introduction

The aim of this appendix is to supplement the discussion presented in Section 3, which introduces the SA scope. Specifically, whilst Section 3 introduces SA scoping and presents the SA framework, this appendix aims to:

- Respond to responses received through the scoping consultation (2021);
- Explain changes made to the SA framework;
- Present a supplementary discussion of key issues.

The scoping consultation

As explained in Section 3, the council consulted widely on a 'Draft Scoping Report' in early 2021 (going beyond the statutory requirement, which is to consult only with the three statutory environmental consultees). The decision has been taken not to update/finalise the Scoping Report, but instead to reflect the outcomes of the consultation in this Interim SA Report. Specifically, the outcomes of the consultation are reflected in the discussion presented within this appendix (also Section 3, which presents the SA framework) and elsewhere within the report, specifically within sections dealing with: A) defining reasonable alternatives; B) appraising reasonable alternatives; and C) appraising the Draft Local Plan. This is with a view to ensuring an up-to-date discussion of the SA scope.

All 16 responses received to the consultation are available in full at: www.stalbans.gov.uk/sustainability-appraisal. An overview of the responses received is presented in Section 3, and this section aims to present a more detailed discussion. Each of consultation responses is discussed below (in the order listed at the above the web link).

Carter Jonas on behalf of Burhill Estates Limited

The response focused on the SA framework - specifically the list of objectives - and concluded: *"Whilst we broadly support the objectives in the SASR, we have identified the ones which the Council should prioritise in delivering a sound Local Plan."* This is a comment for the Council to take into account in due course, as opposed to a comment on the SA scope. For the purposes of scoping the SA, it is important to be clear that no particular weight, degree of importance in decision-making, is placed upon each of the components of the SA framework (i.e. appraisal undertaken under the framework does largely involve considering impacts/effects in 'silos').

However, substantive points raised as part of the response are nonetheless helpful to SA scoping. In particular, the response is correct to highlight the close links between issues/opportunities relating to: A) community infrastructure; B) green and blue infrastructure; and C) health and wellbeing. This matter is discussed below.

Barton Willmore on behalf of Crest Nicholson

The response primarily comprised a request to modify the 'housing' related objective such that it refers to "a wide range of good quality housing" rather than "a sufficient amount of good quality housing". This change is agreed.

Environment Agency

The response begins by discussing context documents that might be reviewed. The suggested sources of contextual information / evidence are noted and are taken into account in Parts 1 and 2 of this report. However, it is not considered necessary or appropriate to maintain an up-to-date list of sources of contextual information / evidence. This is because any such list invariably becomes out-of-date, and because there is a need to ensure a tightly scoped SA process, responding to the scope of the emerging plan and reasonable alternatives.

With regards to baseline evidence, the EA response emphasises the importance of taking into account evidence from a St Albans-specific Strategic Flood Risk Assessment (SFRA). The EA also request that a detailed 'level 2' SFRA is undertaken prior to consultation under Regulation 18. This is a matter for the Council more so than a matter for SA scoping; however, it is worth noting here that under the Local Planning Regulations (2012) there is considerable flexibility as to the level of work undertaken under Regulation 18.

The EA response then comments on several of the SA objectives:

- Biodiversity – the request for added mention of / focus on biodiversity net gain is accepted.
- Land contamination – it is accepted that "contaminative development in areas with sensitive groundwater" could feasibly be an issue for the Local Plan. The EA helpfully set out the potential scope of issues as follows:

"Groundwater is a precious resource within the area, providing drinking water and a source for the borough's chalk streams and therefore must be protected. New development could result in the pollution, especially for sites situated in vulnerable groundwater areas with Source Protection Zones (SPZ) or on principal or secondary aquifers. In particular, sites where the previous land use suggests the potential presence of contamination or the proposed land use is potentially contaminative will need to be dealt with in a way which protects the underlying groundwater." This matter is discussed further below.

- Water – the response discusses sources of evidence for understanding the status of water bodies, surface water and groundwater. It then goes on to discuss issues in respect of water supply, as understood from Affinity Water's Water Resource Management Plan (2020). A key issue for the Local Plan / SA is in respect of supporting high levels of built environment water efficiency, with the EA stating: *"… it would also be strongly encouraged to outline water resources and efficiency within the sustainability appraisal with reference to the standards to meet both the Building Regulations Part G and the BREEAM assessments for 'excellent' ratings for water efficiency."* Finally there is a discussion of wastewater infrastructure capacity, which could well prove to be a significant factor with a bearing on Local Plan spatial strategy / site selection.
- Flood risk – the recommendation to refer to 'reducing' flood risk rather than 'minimising' is accepted, as is the request for an added emphasis on flood risk under climate change scenarios.
- Climate change – the comments received deal with climate change adaptation, and serve to highlight that climate change adaptation is a highly cross-cutting topic (i.e. climate change adaptation can and should be considered under all or most sustainability topic headings. This matter is discussed further below.

Other matters discussed within the response include:

- Sustainable Drainage Systems (SuDS) – are primarily a matter for the planning application but must also be a consideration at the local plan stage, including mindful of the implications of local geology. They are a cross-cutting consideration, with implications for flood risk, water quality and green / blue infrastructure. The EA response provides a helpful overview of SuDS): *"Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site."*
- Blue Infrastructure: The EA explain: *"Blue infrastructure is very important for St Albans and we recommend the Local Plan has a strong ambition to improve the connectivity of the river habitat and protect and enhance all watercourses… The River Ver and Colne are globally rare chalk streams, and should be considered priority habitats and included within the category of sensitive environments, in order to fully embed their importance and need for protection. This is in line with the Hertfordshire Biodiversity Action Plan, which acknowledges that the Ver is one of the five rivers in the Thames region which is most seriously affected by low flows, and stresses the importance of enhancing the quality of Chalk Rivers. Furthermore, this reflects the objectives of the Revitalising the River Ver Project."* The response also discusses the importance of deculverting waterbodies.

Harpenden Town Council

Key issues raised include:

- Transport connections – it is agreed that there is a role for the local plan to consider ways of improving east-west connections, whilst north-south connections are already strong.
- Car travel – it is agreed that there should be a focus not only on car travel to work, but also to school.
- Water – the following is broadly accepted: *"Water usage is a major issue given the level of development being planned for. Tweaking round the edges/reduced consumption is felt not to be sufficient. There is a fundamental need for major infrastructure investment in water supply, whilst ensuring protection is afforded to the important and rare chalk streams present within the district. It is appreciated, this matter may not lie directly in the St Albans Local Plan but still needs to be acted upon."*

Herts and Middlesex Wildlife Trust

It is accepted that there should be an added emphasis on biodiversity net gain. It is also recognised that there must be a strategic, landscape scale approach to planning for biodiversity, as opposed to looking at key sites / assets in isolation.

Historic England

The response presented a standard list of context documents (see discussion above, under 'Environment Agency') and also a generic statement on the approach that should be taken to establishing/understanding the baseline.

The response then went on to make some St Albans-specific recommendations in respect of key issues for the Local Plan SA, including a proposed new focus on the setting of assets and also exploring opportunities. These recommendations are taken into account as part of the updated discussion of key issues presented below.

The response then concluded with a discussion of "Method for generation of alternatives". This discussion strays slightly from a strict discussion of the SA scope; however, the points are all noted, and reflected in the discussion presented in Section 5 (Defining growth scenarios). As part of the process of defining growth scenarios there is invariably a need to give consideration to individual site options, and historic environment constraints affecting site options are always a key consideration. However, it is crucially important to ensure a proportionate approach to the consideration of individual site options as part of the process of defining growth scenarios.

Lichfields on behalf of Legal and General Capital ('L&G')

The response states: *"We do not provide detailed comments on the SASR, but welcome the acknowledgement in the SASR that without an adopted Local Plan there will be an even greater shortage of housing, which would particularly affect young families wanting to get on the housing ladder as well as the provision of affordable housing to meet the needs of lower income groups."*

London Colney Parish Council

A short list of comments was provided, including:

- Design on green belt sites should be landscape led.
- Special consideration should be given to infrastructure and resources, in particular water.
- Air quality should be objectively monitored depending on the sites where traffic movements were highest i.e., London Colney with A414, A1081 and M25.

Marrons Planning on behalf of Martin Grant Homes and Kearns Land Ltd

No comments were made on the SA scope, i.e. the scope of key evidence and issues/objectives that should be taken into account as part of the appraisal of the plan and reasonable alternatives. Rather comments focused on expectations in respect of the methodological approach to local plan-making and SA. The response emphasised the importance of taking into account made and emerging neighbourhood plans and their supporting evidence.

Marrons Planning on behalf of Martin Grant Homes and Kearns Land Ltd

No comments were made on the SA scope, i.e. the scope of key evidence and issues/objectives that should be taken into account as part of the appraisal of the plan and reasonable alternatives. Rather comments focused on expectations in respect of the methodological approach to local plan-making and SA. The response emphasised the importance of taking into account made and emerging neighbourhood plans and their supporting evidence.

Quod on behalf of Pigeon Investment Management Ltd

Again, no comments were made on the SA scope, but rather the response sought to set out expectations in respect of the wider SA process. The following statement is incorrect: *"In order to ensure that the Local Plan is found to be sound, the Sustainability Appraisal Scoping Report needs to allow for a clear audit trail that will show how and why SADC has arrived at its decisions e.g. on its preferred approach and site allocations."* N.B. nor is it the case that the SA Report must present an "audit trail". Rather, the fundamental requirement is to present: A) an appraisal of the plan and reasonable alternatives; and B) an outline of the reasons for selecting the alternatives dealt with.

Sandridge Parish Council

Key comments received included:

- Transport – the suggested distance thresholds are noted (see discussion in Appendix IV). Also, it is agreed that the concept of 15 minute cities / 20 minute neighbourhoods should be drawn upon for the Local Plan SA.
- Community infrastructure – the distinction between 'local' and more strategic community infrastructure is agreed, and it is also agreed that access to playing pitches should not be conflated with access to open space.
- Health – it is agreed that there must be a focus on *"cooperation with health partners and developers to ensure sufficient GP, primary and secondary care to maintain good health capacity for all changes in population."*

- Heathland – it is agreed that remnant heathland is an important consideration, even where not designated.
- Water – the issue of the bromate plume at Sandridge is noted.
- Indicators – the response makes a number of recommendations regarding indicators. However, the current proposed approach is to focus less on the application of indicators for the purposes of appraisal (given inherently limited ability to quantify performance against indicators at the local plan level). Indicators for the purpose of monitoring local plan implantation are discussed in Part 3 of this report.

Carter Jonas on behalf of Stackbourne Ltd

The issues discussed in respect of housing need locally are noted, for example: *"[The district] is amongst the most unaffordable outside of London, just 17.2% of the 2,182 completions in the last five years (2015/16 – 2019/20) have been affordable dwellings. This is also only significantly beneath the Council's own adopted target of 35."*

The response concludes: *"In summary, whilst we broadly support the objectives and aims set out in the SA, we have taken the opportunity to emphasise three key elements of the recently withdrawn Local Plan which the Council should seek to rectify in the production of the Local Plan 2020-2038."*

Strutt & Parker on behalf of Taylor Wimpey Strategic Land

The following suggested key issues are noted:

- Ensure existing and future housing needs are met, including affordable and specialist housing, and by size, type and tenure.
- Ensure the vitality of existing communities, including rural communities, is sustained.
- Improve affordability of housing in the district.

The following proposed objective is also noted: *"Meet evidenced current and future projected housing needs, including needs having regard to factors which may have suppressed projections, such as affordability"*

The SA framework

The updated SA framework – in the form of list of sustainability objectives grouped under topic headings – has already been presented in Section 3. The aim of the table below is to highlight additions (underlined text) and deletions (strikethrough text) made to the sustainability objectives subsequent to the scoping consultation.

The other change made to the framework subsequent to the consultation involves grouping the objectives under headings in a different way; however, there is not considered to be a need for any further explanation of that step. The aim is simply to support a suitably concise, focused and accessible appraisal, with minimal need for repetition.

The SA framework

Topic	Objective(s)
Accessibility	• ~~Promote~~ Support access to community infrastructure – both strategic (e.g. secondary schools) and local (e.g. primary schools) – for all sections of society, including mindful of 15 minute city / 20 minute neighbourhood principles.
Air and wider env quality	• Achieve good air quality across the district and more widely, including with a particular focus on improving air quality in current known hotspots, notably air quality management areas.[27]
Biodiversity	• Protect, maintain and enhance biodiversity in the district and more widely, supporting effective implementation of the biodiversity net gain regime and taking a landscape scale perspective (mindful of the forthcoming Local Nature Recovery Strategy).
Climate change adaptation	• ~~Minimise~~ Reduce the risk of flooding accounting for climate change scenarios and with a focus on risk affecting both new and existing communities. • ~~Promote~~ Ensure adaptation and resilience to climate change more widely, recognising that this is a key cross-cutting topic, e.g. with links to biodiversity, communities / health and the water environment.

[27] There is only one AQMA in the District, but there is also a need to consider cross-border issues / impacts.

Topic	Objective(s)
Climate change mitigation	• ~~Promote~~ Ensure all steps are taken in support of mitigation to climate change*, with a particular focus on per capita emissions, but also mindful of district-wide total emissions and associated targets.* • Reduce greenhouse gas emissions (with a particular focus on per capita) from both the built environment (a focus here) and transport (also a separate focus of discussion below).
Communities and health	• Support active and healthy communities, including via access to open spaces, high quality green and blue infrastructure, active travel infrastructure and sports and recreation facilities.
Economy	• ~~Encourage~~ Achieve a strong and resilient economy across the district (and more widely), including by providing for employment land needs and supporting St Albans city centre and other centres with ~~an appropriate long term~~ a strategic response to ~~Covid-19~~ national trends.
Historic environment	• Preserve and enhance heritage assets and their settings and consider the historic environment more widely, including links to landscape, character and sense of place.
Housing	• Provide a ~~sufficient amount~~ wide range of good quality housing (in terms of type, tenure and location) which meets headline housing need as far as possible and accounts for the specific needs of all sections of society ~~in sustainable locations~~.
Landscape	• Maintain and enhance the quality of the countryside and landscape, particularly those that are known to be highly valued, e.g. those that are highly visible, accessible or contribute strongly to wider character and sense of place.
Soils / resources	• Prioritise locating new development on previously developed land first. • Minimise development on best and most versatile agricultural land and minimise the degradation/loss of soils, particularly soils known to be of higher quality. • Promote efficient use of natural resources, account for the Hertfordshire Minerals and Waste Plan and protect material assets and geodiversity.
Transport	• Encourage the use of active and other 'sustainable' means of transport and reduce the need for people to travel.
Water	• Conserve and enhance water quality and flow and reduce the risk of water pollution, including by taking careful account of any capacity issues at wastewater treatment works.

Key issues

The Scoping Report (2021) presented a list of SA objectives (see discussion above) alongside supplementary key issues, appraisal questions and indicators. The aim here is to build upon this by presenting a concise discussion of 'key issues' under each of the 13 sustainability topic headings presented in the table above.

It is important to caveat this with an understanding that the discussion of key issues presented below reflects only a broad understanding of the 'plan scope'. Beyond this, it is important to identify key issues for the purposes of appraisal *given the nature of the plan options that are under consideration*.

Broad key issues are discussed below under the 13 sustainability topic headings.

Accessibility

Access to **community infrastructure** is invariably a key issue for local plan-making. There is a need to avoid undue strain on existing infrastructure, including by delivering new and upgraded infrastructure alongside housing growth, and ideally deliver 'planning gain' to the benefit of the community (e.g. settlement) as a whole. Spatial strategy and site selection / consideration of growth scenarios is a key means of addressing issues and realising opportunities, plus there is an important role for policy (district-wide and site-specific) and masterplanning.

Community infrastructure is **a broad term**, and there is cross-over with considerations that factor-in under other topic headings; for example, green / blue infrastructure and infrastructure relating to health and active travel. There are various approaches that might be taken to categorising infrastructure, but there is arguably a key distinction

between **strategic** (e.g. a secondary school, leisure centre of health campus) and **local** (e.g. a primary school, or a new community hub for a village). Schools capacity is quite often a key issue for local plans, and there are indications that this might be the case for the St Albans Local Plan. However, planning for **schools** capacity is challenging due to the nature of school place projections, due to parental choice (such that parents will often choose to send children to a school further afield) and because of the free schools system. One issue nationally, at the current time, is low birth rates from circa 10-12 years ago leading to issues with maintaining school roles at some primary schools, but it is not clear that this is a significant issue locally.

From a review of the Scoping Report (2021) and consultation responses, specific **key issues also include**:

- The city, town and district centres – locally are naturally key hubs for community infrastructure, but may also warrant being a focus of discussion under the 'economy' heading. Centres locally broadly appeared resilient pre Covid 19 but there are indications of increased vacancy rates.
- Health and wellbeing – is a focus of stand-alone consideration below, but clearly relates closely to 'access to community infrastructure'. The district performs well across a wide range of monitoring indicators, but there are nonetheless inequalities locally, including spatial inequalities that might be addressed through the Plan.
- High speed broadband – might be considered under the 'accessibility' heading (also economy).

Air and wider environmental quality

A priority issue is addressing poor air quality in known hotspots. This primarily means air quality management areas (**AQMAs**), of which there is one in the District and others located fairly nearby (see map of AQMA here). However, there is also a need to remain alive to data serving to identify air quality hotspots other than AQMAs. Spatial strategy / site selection is a key opportunity to minimise and potentially reduce **traffic** (the key source of air pollution), plus there is an important role for policy (district-wide and site-specific) and masterplanning.

Air pollution from traffic has decreased rapidly over recent years and is set to decrease much further due to the national switch-over to **electric vehicles** (EVs). However, the trend to EVs has begun to slow recently, such that the timetable remains uncertain; also. Also, air pollution will remain an issue even following the switchover, as EVs are heavier vehicles that lead to high levels of particulate pollution from brake, tyre and road wear.

Finally, it is important to also consider 'wider environmental quality' issues, particularly **noise pollution**. This is largely an issue that is dealt with effectively through 'the market' (because house buyers will typically be aware of sources of noise), but this is not entirely the case. As such, there is a need to scrutinise proposals to direct new housing to locations that might historically have been seen as less appropriate for housing due to noise pollution.

Biodiversity

A clear starting point is the hierarchy of **designated sites** locally, each of which will be associated with known sensitivities/issues or issues that can be safely inferred, given knowledge of the habitats present. Specific key issues are explored in detail in the appraisal sections of this report; however, it is important to note here that an effective approach to planning for biodiversity involves considering issues/opportunities at **landscape scales**, where a landscape is defined as a collection of key sites / areas of valued habitat *and the intervening landscape.*

As part of this, there is a need to support ecological networks / functional connectivity between habitat patches, including with a view to enabling species populations to respond to pressures including climate change. River and stream corridors are a key 'landscape scale' at which to plan for biodiversity (alongside associated ecosystem services, such as flood risk management, recreational uses and heritage value), but others can also be identified, often linking closely to landscape character areas. It is anticipated that the forthcoming **Local Nature Recovery Strategy** (LNRS; a requirement under the Environment Act) will assist with identifying landscape-scale priorities.

Finally, there is a need consider the other key requirement under the Environment Act, which is a requirement for development to deliver a mandatory 10% **biodiversity net gain**, as measured using the Defra Biodiversity Metric. Biodiversity Net Gain is primarily a matter for the planning application stage, as opposed to the local plan-making stage. However, there is a clear need for a strategic approach, both in terms of: A) directing growth to locations with greatest 'net gain' opportunity (or, at least, sites not likely to pose an issue in terms of achieving sufficient net gain); and B) identifying sites (or even a network of sites) that can be a focus of habitat creation or enhancement in order to create biodiversity 'credits', which can then be purchased by developers in order to achieve sufficient biodiversity net gain (where it is the case that biodiversity net gain cannot be achieved onsite). Another matter for the local plan is the question of whether policy might require biodiversity net gain over-and-above the 10% legal requirement, whether that be for all sites district wide, certain types of site or perhaps even specific sites.

From a review of the Scoping Report (2021) and consultation responses, specific **key issues also include**:

- Key / indicator species – can be a consideration, but typically it is appropriate to focus attention on habitats and areas associated with a high density of valued habitat or otherwise known to be of biodiversity importance.
- Monitoring – the extent and status of key habitats is important, but it is unlikely that it will be possible to identify a causal link between any change in monitoring status and the Local Plan as part of the SA process. It is important to note that two SSSIs locally are partially or wholly in unfavourable condition, but the Local Plan is far from the only mechanism for addressing this.

Climate change adaptation

A key issue for local plans is invariably **flood risk**. This is a key 'adaptation' consideration, including given the impacts of flooding, and mindful of the uncertainties around climate change projections. Mapped data showing the location of nationally identified fluvial and surface water flood zones is available here.

Aside from flood risk there are wide ranging climate change adaptation considerations that warrant being a focus of local plan-making, including the key task of spatial strategy and site selection / consideration of growth scenarios. Indeed, climate change adaptation is a **cross-cutting** issue that must factor-in as part of the appraisal under all topics, but most notably biodiversity (including supporting ecological connectivity / networks), communities/health (including over-heating risk) and water (droughts and heatwaves place stress on the water environment).

Climate change mitigation

SADC has committed to an ambitious target of achieving **net zero** carbon emissions district-wide by 2030. This is on par with the most ambitious targets nationally, with only a small number of urban authorities having committed to an earlier target date. In light of this target, the key wording within the NPPF undoubtedly applies strongly, namely: "*The planning system should… help to… shape places in ways that contribute to **radical reductions in greenhouse gas emissions**…"* [emphasis added].

Also, there is a need to consider that, whilst the local net zero target is important, what is arguably more important is **per person ('per capita') emissions**. What this means in practice is that it is difficult – and arguably inappropriate – to argue for lower housing growth in St Albans on the basis that this would assist with meeting the local 2030 net zero target. This reflects the fact that not meeting housing needs locally would lead to A) continued inability for new households to form / concealed households / overcrowding, which is something that is difficult to argue in favour of (albeit there might be some positive effects for greenhouse gas emissions); and/or B) unmet housing need locally that is met elsewhere (with no net effect in terms of the number of new homes nationally).

When considering climate change mitigation / decarbonisation through local plans it is important to ensure suitably structured / systematic consideration of the **various sources of greenhouse gas emissions**. A conceptual framework is called for, under which there is a top-level distinction between emissions from A) the built environment (particularly new build development, which is overwhelmingly the focus of local plan-making); and B) transport (recalling that there is a 'transport' heading below).

From a review of the Scoping Report (2021) and consultation responses, specific **key issues also include**:

- Renewable energy – a key focus is maximising delivery localised heat and/or power generation (although not combined heat and power, CHP). However, another potential issue for local plans is in respect of a policy framework to guide planning applications / support delivery of large-scale, stand-alone renewable power schemes, which primarily means solar farms, in the St Albans context.
- Building Regulations – minimum greenhouse gas emissions standards, as required under the Building Regulations, are in the process of being tightened to a Future Homes Standard. However, there remains the potential for local plan policy to require emissions standards that go beyond the minimum requirement. As part of this, there is the potential to require 'net zero' development, although this is a term that must be carefully defined (there has recently been good progress made nationally, including through recently adopted local plans for Cornwall and Bath / North East Somerset). A key issue is invariably the extent to which there is flexibility for offsetting (or, in other words, the extent to which net zero must be achieved onsite), and also the extent to which there is flexibility to achieve an emissions standard that falls short of net zero for viability reasons.

Communities and health

This topic heading offers an opportunity to consider **wide-ranging issues** over-and-above the key issue of accessibility to community infrastructure. Access to open space, sports facilities, green and blue infrastructure, active travel infrastructure and high quality / accessible countryside can appropriately be a focus of discussion under this topic heading, although there are clear cross-overs with other topic headings. Other matters that could potentially be a focus of appraisal (dependent on the nature of plan proposals/options) include:

- supporting the vitality and viability of existing centres and rural communities;
- health and safety considerations (including road safety);
- integrating communities and supporting wide-ranging equalities objectives;
- delivering high quality place-making; and
- minimising the negative effects of development, e.g. relating to construction and traffic congestion.

Economy

As with housing, a key priority issue is invariably **providing for need** as far as is consistent with sustainable development. However, understanding need/demand for new employment land can be quite complex, including as there is a need to take into account a range of specific types of need (e.g. industrial versus office space), account for loss of employment land to housing (under permitted development) and 'churn' within existing employment land (i.e. existing employment land being repurposed).

Furthermore, there is a need to consider long term strategy for employment growth, the effect of employment clusters / agglomerations, the extent to which demand for employment space is 'footloose' (e.g. where it might be provided for anywhere within a broad area to the same effect) and the importance of balancing housing and employment growth, with a view to minimising longer distance commuting by road.

A key source of evidence is the South West Herts Economic Study Update (2019), although it is now somewhat dated, including as it pre-dates Covid-19. The study identifies South West Herts as a **Functional Economic Market Area**, and so there is a need for coordination of local plan-making across this area.

Beyond ensuring sufficient employment land, another key consideration is supporting the viability of centres as hubs of economic activity, most notably St Albans city centre but also the other higher order centres in the district.

Historic environment

As per the discussion above under biodiversity, the starting point is the range of **designated assets** of varying significance. However, beyond this, there is a need to consider how assets relate to one another and the surrounding landscape, including via considering the '**setting'** of designated assets. There is often a need to consider why assets are located where they are / what is revealed by patterns of assets across an area. Having taken these steps, it can be possible to take a positive / proactive approach to conservation of the historic environment that is supportive of local character, sense of place (including 'time depth') and place-making.

Methodological approaches to appraising reasonable alternative growth scenarios, and the draft plan as a whole, in terms of the historic environment, are quite well established. The appraisal sections of this report present a suitably systematic appraisal. However, Historic England's consultation response received in 2021 also requested detailed work as part of the process of defining reasonable alternative growth scenarios, including as part of work to sift / shortlist available site options. This is a reasonable request; however, there is also a need to ensure proportionality. See further discussion in Section 5 (Defining reasonable growth scenarios).

Finally, there is a clear need to note the particular importance of St Albans City Centre. As set out within the Scoping Report (2021): *"A new Local Plan will provide an opportunity for framing new policy around the future management of clusters of heritage assets such as St Albans city centre."*

Housing

Headline considerations are in respect of setting the **housing requirement** and also policy on **affordable housing** (i.e. the question of the extent to which affordable housing is prioritised alongside other policy 'asks' of developers, in the context of development viability considerations, i.e. limitations on available developer contributions / funding).

Beyond this, there is a need to consider the specific nature of the proposed **supply**, including in terms of whether the effect will be to support a good mix of housing, in terms of type, size, tenure and location, and also in terms of delivery risk (there is invariably a need to identify a total supply that exceeds the requirement, given the inevitability of unforeseen delivery issues at the planning application stage and/or post planning permission being granted).

Specialist housing is another key consideration, as is providing for **Gypsy and Traveller accommodation needs**. Further considerations include space standards and also the adaptability of housing, e.g. for those with disabilities.

Landscape

Whilst there are no nationally designated landscapes in the district, there are well understood **landscape character areas**, each associated with distinct characteristics, to be protected and potentially enhanced. It is difficult to

confidently differentiate between character areas – or landscape parcels of any scale – in terms of value or **sensitivity**; however, various factors can be taken into account to give an indication. These include: links to settlement, including settlement form, particularly historic settlement form; topography and 'enclosing' vegetation, given that longer distance views will tend to be valued; links to valued historic environment and biodiversity assets; and accessibility, including views from key locations, roads and public rights of way.

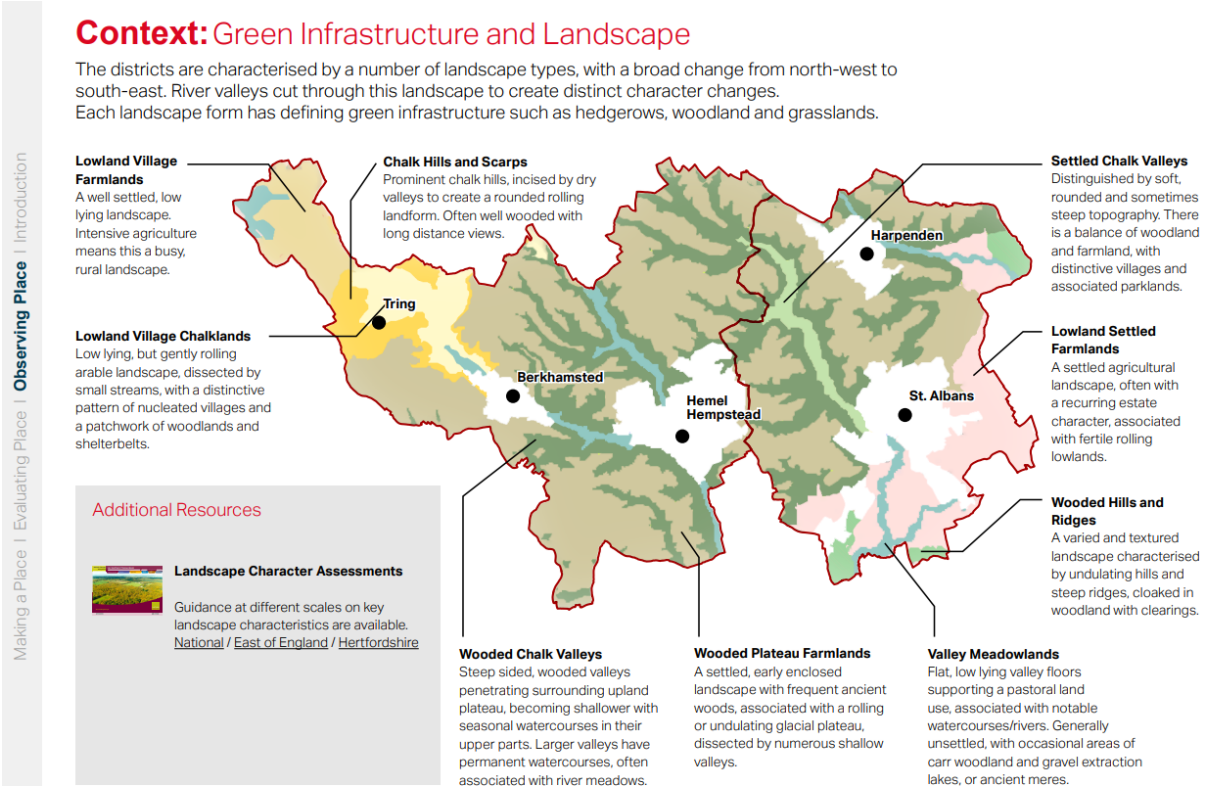
There is also a need to consider landscape with a long-term perspective, given clear arguments for planning comprehensively as opposed to opening the door to future development creep, or **'sprawl'** (although there can also be arguments for enabling settlements and communities to expand organically over time).

There is also a need to be mindful of evidence generated by the Stage 2 **Green Belt Review** (2023), albeit with upmost caution, as Green Belt is not a landscape designation (rather, the Green Belt has five very clearly defined purposes). In particular: the identified Green Belt parcels may have some correlation with landscape character areas; and three of the defined Green Belt purposes have some links to landscape (in light of the discussion above), namely Purpose 1 ("check unrestricted sprawl"), Purpose 2 ("prevent settlements from merging") and Purpose 4 ("preserve the setting and character of historic towns").

A final consideration – as reported in the Scoping Report (2021) – is the need to be mindful that growth in the west of the district does link quite closely to the **Chilterns AONB**, hence there is a need to be mindful of issues and sensitivities, including recreational pressure on key sites and potentially traffic along rural roads / lanes that might be popular routes for cyclists and horse riders. An AONB boundary review is currently underway.

N.B. with regards to landscape (also historic environment and biodiversity) a range of helpful maps are presented within the St Albans Strategic Sites Design Guidance (2023), available at: www.stalbans.gov.uk/evidence-base.

***Figure A**: An extract from the St Albans Strategic Sites Design Guidance (2023)*



Soils / resources

A clear priority is avoiding the lost of productive **agricultural land**, particularly that which is defined as 'best and most versatile', which is defined as that which is of grade 1, grade 2 or grade 3a quality. However, data availability is a barrier, as the nationally available dataset is very low resolution (and does not differentiate between grades 3a and 3b) whilst the available dataset showing agricultural land quality with a high degree of accuracy (following fieldwork) is very patchy. In this light, site promoters are encouraged to submit evidence on land quality.

Aside from agricultural land quality, it can be difficult to reach strong conclusions on the effects of local plans on 'resources' more widely. However, one immediate consideration is the need to support the objectives of **minerals**

and waste planning, which is led locally by the County Council. As part of this, a key consideration is often avoiding the undue sterilisation of known minerals resources that might. have the potential to be viably extracted.

Also, a subject that is increasingly recognised nationally and internationally as being of key importance is minimising 'non-operational' built environment greenhouse gas emissions, in particular the **embodied emissions** in construction materials. The implication is a need to seek to reuse buildings (at least their steel and concrete 'super structure') ahead of demolition and rebuild is increasingly seen as a climate change mitigation priority. Equally, there is a new focus on designing and constructing buildings with a view to future repurposing, i.e. seeking to avoid or delay the need for future demolition. This approach is inline with 'circular economy' principles.

Transport

This is **a key issue** locally from a range of perspectives, including climate change mitigation, traffic congestion, health and wellbeing, the historic environment and the economy. There is a need to direct growth to the most accessible and best-connected locations, particularly those that are well-connected in terms of public and active transport. Also, there is a need to support specific strategic transport objectives, including as established at sub-regional scales, and including in terms of directing growth so as to deliver or facilitate delivery of new strategic transport infrastructure (e.g. new cycle routes or road/junction upgrades in support of bus connectivity). In the St Albans context there is also a need to support the viability and functioning of the Abbey Line to Watford.

There is a clear need to recognise that **strategic growth locations** can tend to have merit, from a transport perspective, over-and-above a strategy that involves 'dispersing' an equivalent number of new homes across smaller sites, because strategic growth locations can support a degree of self-containment / internalisation and can deliver new strategic transport infrastructure, potentially to the benefit of existing as well as new communities. However, there can also be a traffic-related argument for dispersing growth across road corridors.

There is typically a need to undertake detailed **modelling** to understand movement and traffic flows as a result of proposed growth / growth scenarios; however, modelling can prove costly and time-consuming, such that modelling growth scenarios is not common practice. Ahead of detailed evidence from modelling there is a need to make cautious but pragmatic assumptions regarding movement and traffic flows and, in turn, consider potential issues and opportunities. In the St Albans context there is quite good understanding regarding key traffic hotspots.

Water

As discussed above, the Environment Agency (EA) submitted a detailed consultation response in 2021, setting out their views on key issues locally. Since that time matters relating to both **water availability** (i.e. low levels/flows affecting water availability and habitats) and **water quality** (within water bodies failing Water Framework Directive objectives and at valued biodiversity sites susceptible to nutrient enrichment) have risen up the agenda nationally.

With regards to water supply, a key issue is designing buildings such that they support high levels of water efficiency (e.g. 100 litres per person per day). With regards to water quality, a key issue is in respect of taking account of any known issues at wastewater treatment works (in terms of ability to receive / treat additional flows) and also accounting for the implications of local geology for Sustainable Drainage Systems (SuDS).

Other key information is available via an online mapping resource made available by the Environment Agency, which notably highlights: Ecological status of rivers – the Rivers Ver, Lee and Colne through the district are assigned 'moderate' status, but the River Colne is assigned 'poor' status south of its confluence with the Ver at Bricket Wood; Quantitative status of groundwater – both the Mid-Chilterns Chalk and the Upper Lee Chalk aquifers are assigned 'poor' status; and Chalk streams – the location of chalk streams across the region is shown.

Appendix III: Strategic factors

Introduction

This section supplements Section 5.2 of the main report. Specifically, the aim is to present a review of 'broad distribution' issues / opportunities / options that should be taken into account when defining growth scenarios for appraisal (Section 6) and consultation. The aim is to establish 'top down' evidence to inform the setting of parameters and to inform decisions on selecting scenarios as reasonable / unreasonable within those parameters.

The review might be structured thematically, spatially or chronologically. On balance, a decision was made to structure this section under the following sub-headings:

- SW Hertfordshire Joint Strategic Plan
- Hemel Garden Communities
- Evidence reported to LPAG
- Recent evidence

SW Hertfordshire Joint Strategic Plan

The genesis of the Joint Strategic Plan (JSP) was a formal Memorandum of Understanding agreed in 2018, pledging to work together to understand and plan strategically for the future development needs of South West Herts. This was followed by a signed Statement of Common Ground in 2021, covering:

- Spatial strategy – particularly in terms of the distribution of growth and a town centre hierarchy.
- Strategic areas for growth - and the role of each.
- Green Belt – ensuring a strategic approach to Green Belt, as well as green/blue infrastructure.
- Strategic employment - including any priorities and spatial implications from LEP strategy.
- Strategic transport and infrastructure priorities – key to good growth, with the SoCG also committing to the following: *"Working with the Hertfordshire Growth Board (HGB) and infrastructure providers… assist in identifying and supporting any SWH strategic infrastructure funding opportunities"*.
- Cross-cutting themes - including zero carbon, promoting social cohesion; healthy and inclusive growth; high quality development and design; supporting sustainable development.

Once adopted the JSP will be a formal statutory plan. This means it will carry significant weight and will be used to inform key planning decisions, alongside local and neighbourhood plans – see Figure 5.2.

Local plans will need to reflect the vision, objectives and strategic policies set by the JSP. The JSP will provide the overall spatial strategy and set the level of housing and employment land to be provided to 2050. It will also identify the key pieces of infrastructure required to support growth and may identify key strategic growth locations.

Following an initial consultation in 2020, a major consultation was undertaken in 2022 entitled: *South West Hertfordshire 2050 – Realising our potential*. Subsequently, the JSP team reported initial findings of the consultation to the St Albans Local Plan Advisory Group (LPAG) in January 2023. Key findings included:

- **Engagement** – was high, for example with 25,000 questions answered and 5,200 written submissions. 57% of respondents were aged 55 or over (or preferred not to give an age), in comparison to a figure of 32% from the initial consultation in 2020. Also, nearly twice as many men responded as women.
- **Thematic priorities** (for SWH over the next 30 years) – amongst a range of findings was:
  - The highest overall priorities were found to be 'natural & green living' and 'sustainable infrastructure'.
  - The biggest issues for the environment were found to be climate change and protecting landscapes.
  - The biggest issue to address for living in SWH was overwhelmingly found to be 'access to healthcare' (52%) followed by rising house prices (21%).
- **Spatial strategy** – the consultation document presented seven non-mutually exclusive broad options for distributing growth (in practice there is inevitably a need for a balanced strategy). The figure below presents a summary of the findings, showing strong support for growth within existing settlements and also focusing growth along transport corridors / at locations that are best connected in transport terms.

***Figure A**: The South West Herts sub-region*

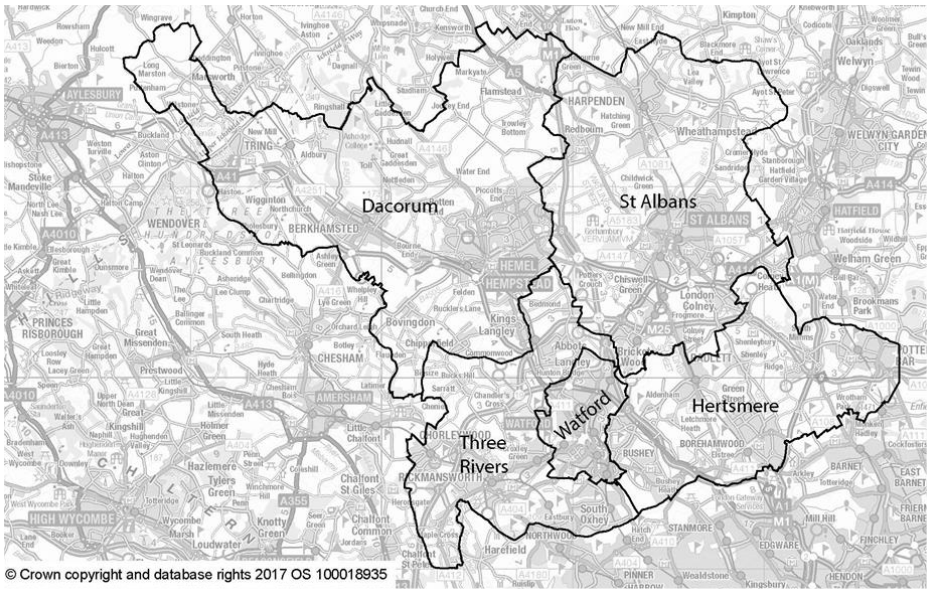


***Figure B**: Findings of the SW Herts consultation on broad distribution options (2022)*

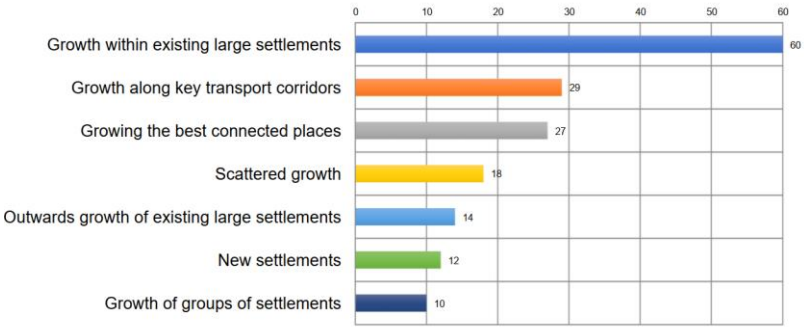


***Figure C:** JSP links to wider high-level strategy and local plans*

Hemel Garden Communities

Hemel Garden Communities (HGC) is an ambitious development programme aiming to deliver more than 11,000 new homes and 10,000 new jobs by 2050. It would involve expansion of Hemel both to the north within Dacorum Borough and to the east within St Albans District (see Figure 5.4). The aim is that:

"… supported by Garden City Principles, HGC will take the best of the New Town heritage into the 21st century with a new development of over 11,000 homes and 10,000 jobs."

An HGC board has been meeting since 2019 and, to date, the partner organisations have published a Charter and a high-level Spatial Vision. Dacorum Borough consulted on HGC as part of a Draft Plan consultation (Regulation 18) in 2020 and has continued to be supportive of HGC since that time. Also, the previously submitted St Albans Local Plan (2018; withdrawn in 2019) involved expansion of Hemel into St Albans in a manner very similar to that which is now being proposed as part of HGC.

A presentation on HGC was first given to the St Albans Local Plan Advisory Group (LPAG) in November 2021. This emphasised the strategic transport challenges that would be faced by supporting growth in and around Hemel in the absence of HGC (e.g. in terms of securing funding and achieving sufficient "focus" given "multiple existing strategies for transport improvement"). The presentation explained that growth at scale leads to inherent transport opportunities, and also discussed five "big moves" specific to HGC: 1) active travel; 2) interchanges; 3) HERT (discussed below); 4) bus network; and 5) future mobility.

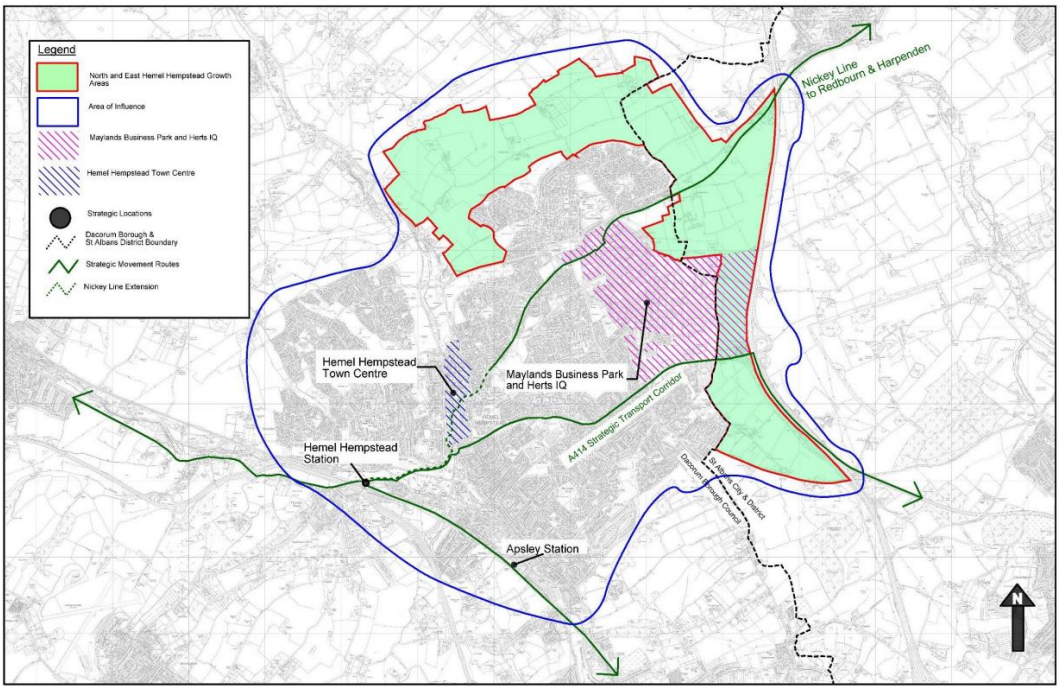
A second presentation was then provided to LPAG in September 2022. This presentation explained that a Framework Plan is in preparation, and that: *"Three issues have been identified that affect the scale of development the site can accommodate. These are the extent of development on the Gade Valley, the extent of on-site provision of suitable alternative green space to mitigate the impact on the Beechwoods and Ashridge, and the potential need for a secondary school to accommodate housing growth in Hemel."*

It is evidently the case that there is strong momentum behind HGC. Furthermore, the appraisal of local plan growth quanta alternatives presented in Appendix III of this report - which assumes HGC under the highest growth scenario and no HGC under the lowest growth scenario - presents high-level evidence in support of HGC from a range of planning and sustainability perspectives, with limited apparent drawbacks.

As such, there is a need to question whether 'no HGC' is a reasonable option that warrants being taken forward for consideration through the appraisal of local plan reasonable growth scenarios. There is clearly a need for further detailed testing, but there is an argument to suggest that attention should focus solely on the question of *how* the scheme should be taken forward (including in respect of scale and extent of growth), as opposed to also opening the door to discussion of *whether* it should be taken forward.

The matter of reasonable scenarios for HGC is discussed further below.

***Figure D**: The extent of HGC, also showing the Dacorum / St Albans boundary*



Evidence reported to LPAG

The Local Plan Advisory Group (LPAG; N.B. subsequently replaced by the Planning Policy and Climate Committee) met roughly once every two or three months over the course of late 2021 to early 2023. The group has considered reports and presentations on a range of topics relevant to the local plan, representing a best practice approach. The aim here is to provide a brief overview under thematic headings and in broad chronological order.

DtC meetings

The first meeting of LPAG in September 2021 considered reports on a series of meetings between St Albans District officers and officers from all neighbouring local authorities, as well as Hertfordshire County Council. The series of reports serves to highlight a range of key issues and opportunities, including:

- **Housing need** – at all of the DtC meetings (and via follow-up letters) it was confirmed that there is no capacity to provide for unmet need from St Albans. Things have moved on somewhat since 2021, as discussed above. However, the practical reality is that unmet housing need from St Albans could be highly problematic for the sub-region. It would need to be dealt with under the DtC as far as possible (albeit in the context of the SW Herts JSP) and could well lead to a significant delay to plan-making.
- **Strategic Rail Freight Interchange** – at all of the meetings the question was asked as to whether the SRFI might be delivered elsewhere, but no opportunities to do so were highlighted. Things have moved on since 2021, as discussed here, such that the SRFI is now expected to be delivered in the plan period. In turn, there is a need to be aware of a future increase in HGV traffic in the area (including Hertsmere).
- **Green Belt Review** – was discussed a key piece of evidence. At the time of the meetings, in early 2021, it was anticipated that the evidence would be in place by summer 2021, but in fact there have been considerable delays. This has created a challenge for the plan-making process.
- **Gypsies and Traveller accommodation needs** – were discussed as a strategic / potential cross-border issue, particularly with Dacorum. As discussed further below, meeting Gypsies and Traveller accommodation needs serves as a strong reason for supporting Hemel Garden Communities (HGC).
- **Employment** – a new strategic employment area within the St Albans part of HGC was discussed as being of larger-than-local significance, including as it would extend the existing Maylands employment area. There are several components of a designated Enterprise Zone within the existing Maylands employment area, and the entirety of the land within St Albans that is under consideration for an expansion is designated as an Enterprise Zone (see map of 'Crown Land' here).
- **A414 and Mass Rapid Transit (MRT)** – several of the DtC reports mention that Hertfordshire Essex Mass Rapid Transport Scheme (HERT) was discussed briefly. There was then a presentation to LPAG in September 2021, which emphasised the links between HERT and the wider A414 strategy (Figure 5.5), as well as complexities and challenges associated with realising scheme objectives. The project then hit a milestone in late 2021, when there was an initial consultation. However, no significant progress has been reported since that time. The initial consultation, which closed in January 2022, covered:
  - Need and benefits of the HERT.
  - Principles including the vision and potential key features.
  - Current travel behaviours and the possible trips that could be made using the HERT.
  - Towns and interchanges the HERT could serve, between Hemel Hempstead / Watford and Harlow.
- **Education** – the key point to note was discussion with Dacorum regarding the potential need for a secondary school to serve Hemel Hempstead to come forward within St Albans part of HGC.
- **Hospitals** – there was discussion of the major programme of work ongoing to improve facilities across the West Hertfordshire Hospitals, namely Watford, Hemel and St Albans. The latest situation is that a decision has been made to upgrade the existing sties rather than seek to deliver a new hospital.
- **Chiltern Beechwoods Special Area of Conservation (SAC)** – recreational pressure was raised as an issue at the DtC meeting with Dacorum, and further evidence subsequently emerged – see Box 5.2.
- **Abbey Line** – a branch line between Watford and St Albans. The complete journey takes just 16 minutes, however, the trains run just once every 45 minutes due to the single track. A proposal for an upgrade scheme was submitted to the Government in 2022, but ultimately did not win funding. Its future is a strategic cross-border consideration, given the need to support modal shift and minimise congestion.

- **Hertsmere cross-border issues** – the St Albans / Hertsmere boundary area is quite densely populated, such that growth must be carefully managed, for example in terms of road traffic, maintaining settlement (Green Belt) gaps and strategic planning for green / blue infrastructure. London Colney abuts the boundary and is a higher order settlement in St Albans, such that it must naturally be considered as a location for significant growth through the Local Plan, including potentially with a view to delivering a secondary school that would also serve the north of Hertsmere. With regards to Hertsmere, the DtC meeting in 2021 discussed three potential strategic growth locations close to St Albans, most notably Bowmans Cross, which was then progressed to the Draft Hertsmere Local Plan (now paused, as discussed above) as a site for a 6,000 home new settlement. The location of Bowmans Cross can be seen on the key diagram of the local plan, and Hertsmere officers also presented to LPAG in Nov 2021.
- **Welwyn Hatfield cross-border issues** – the emerging Welwyn Hatfield Local Plan (proposed modifications version, 2023) does not propose any growth in the sensitive gap between St Albans and Hatfield; however, land is being promoted for development in this area, including adjacent to the M1 / A414 junction. Active travel links are another important consideration, with one existing offroad route (following a former railway line) and an ambition for a new cycle route along Coopers Green Lane.

***Figure E**: Introducing the A414 corridor challenge / opportunity*

***Box A**: Overview of the Chiltern Beechwoods SAC recreational pressure issue*

An assessment by Dacorum Borough Council in 2022 revealed that more action is needed to help protect two components of the Chilterns Beechwoods SAC from increasing visitor pressure, including Ashridge Commons and Woods Site of Special Scientific Interest (SSSI). If nothing is done, new development will lead to further visitor pressures and damage to the integrity of the SAC.

A buffer of 12.6km around the Ashridge Commons and Woodlands was defined, which takes in the western part of St Albans District. Within this buffer zone the Council was unable to issue decisions on planning applications for new development for a number of months, ahead of a recreational pressure Mitigation Strategy being agreed.

A Mitigation Strategy was then agreed in late 2022 and must now be implemented. Implementation of the Mitigation Strategy has two key implications for housing growth in the western part of St Albans District:

- Suitable Alternative Natural Greenspace (SANG) – must be delivered alongside new development, with a view to providing an alternative to visiting the Ashridge Commons and Woods. All new developments within the 12.6km zone will need to make provision for sufficient SANG, or alternatively contribute towards a suitable 'strategic' SANG elsewhere. This has implications for development viability (albeit development viability locally is strong) and also means that St Albans District must liaise closely with Dacorum Borough in respect of how to bring forward strategic SANG, most notably in respect of SANG to mitigate HGC.
- Strategic Access Management and Monitoring (SAMMS) – the National Trust has identified a package of measures that will cost a total of £18.2million. This cost will be shared across all of the affected local authorities. In St Albans, this means that developers will be required to pay a tariff of £829 per dwelling.

Hertfordshire Growth Board

Numerous organisations have presented to LPAG, and some of these presentations have already been discussed above. One key organisation for discussion here is the Hertfordshire Growth Board, who presented to LPAG in November 2021. The Growth Board was formed in 2018, and its priorities are: homes and communities, infrastructure, the environment, economy and jobs, investment and positioning Hertfordshire with the Government. Priority projects for South West Herts are **HGC and HERT**. Another notable priority is off-site manufacture of homes, which is a subject discussed further below.

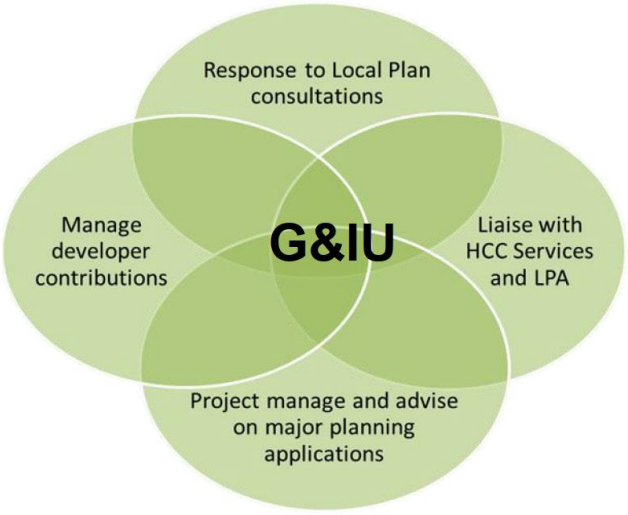
Herts CC Growth and Infrastructure Unit

The Hertfordshire County Council Growth and Infrastructure Unit (G&IU) provided an introductory presentation to LPAG in January 2022. There was an emphasis on effective collaboration with the local plan-making process with a view to addressing infrastructure challenges, realising infrastructure opportunities and more widely achieving **good growth**, defined as a*: "Balance of building homes, creating jobs, providing infrastructure, helping people, protecting environment, improving sustainability Unit."* As part of this, there was an emphasis on early engagement on growth scenarios.

The emphasis on growth scenarios also comes through clearly in the G&IU's Local Plans Engagement Document. The document presents a diagram to explain the G&IUs role and includes an appendix for each of the County Council's service areas, explaining links with local plan-making.

Another key message to take from the document is the merit in directing growth to strategic growth locations with a view to supporting effective working with the County Council in respect of infrastructure and good growth. The presentation to LPAG in January 2022 ended by explaining that the I&GU is currently focused on four 'major sites' (Harlow-Gilston Garden Town; HGC; Brookfield Riverside and Cheshunt Garden Village; and North of Baldock) but is also focused on ~50 local plan 'strategic sites'. It is important to emphasise the close involvement of HCC in respect of ensuring good growth at **Harlow-Gilston Garden Town** - which was removed from the Green Belt through the East Hertfordshire Local Plan (2018) with a view to delivering around 10,000 homes - including via a dedicated officer.

***Figure F**: Overview of the Herts G&IU*



The Environment Act

In March 2022 the HCC Landscape, Ecology, Archaeology, Design & Sustainability (LEADS) team leader presented to LPAG on two key aspects of the Environment Act (2021):

- **Biodiversity Net Gain (BNG)** – is primarily a matter for the planning application stage, as opposed to the local plan-making stage. However, there is a clear need for a strategic approach, both in terms of: A) directing growth to locations with greatest BNG opportunity; and B) identifying sites that can be a focus of habitat creation or enhancement in order to create biodiversity 'credits' (which can then be purchased by developers in order to achieve sufficient BNG, where BNG cannot be achieved onsite).

- **Local Nature Recovery Strategies (LNRSs)** – will primarily be prepared by county councils and will have a significant bearing on local plan growth scenarios. Guidance was published in March 2023, notably setting out that a key aim is to *"map specific proposals for creating or improving habitat for nature and wider environmental goals."* Even under a BNG regime, it remains the case that growth should be directed away from areas of high biodiversity value; however, growth in proximity to 'specific proposals' could potentially assist with realising opportunities to the fullest extent.

Gypsies and Travellers accommodation needs

A report presented to LPAG in March 2022 explained that there is a need for 71 pitches for those Travellers who meeting the 'planning definition', as understood from the Government's Planning Policy on Traveller Sites (PPTS, 2015). Also, the report explained a need to consider the needs of ~45 Traveller households who do not meet the planning definition. Latest understanding, following a legal case in 2022, is that local plans should consider 'cultural' need as opposed to only the needs of those who meet the planning definition.

It is clear that **providing for needs will be a challenge**. However, every effort must be made to meet accommodation needs, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers on average having very poor outcomes in terms of health and wellbeing, educational attainment and a range of other indicators (see evidence available at: www.gypsy-traveller.org/our-vision-for-change).

As such, Traveller accommodation needs must be a key factor influencing development of reasonable growth scenarios. The report to LPAG proposed rolling forward the broad strategy from the previously withdrawn local plan, which looked to provide for needs primarily within larger allocations, including two sites within **HGC** for a total of around 30 - 40 pitches (also, the proposal was for a criteria based-policy in support of windfall supply).

Latest evidence

Three recently published sources of key evidence are reviewed:

- The Hertfordshire Active Travel Strategy (2023)
- The St Albans Local Cycling and Walking Implementation Plan (LCWIP, 2023)
- The Climate Change Committee's 2023 Progress Report to Parliament.

The Hertfordshire Active Travel Strategy

Whilst the strategy will seek to address Active Travel across the whole county, there is a particular focus on:

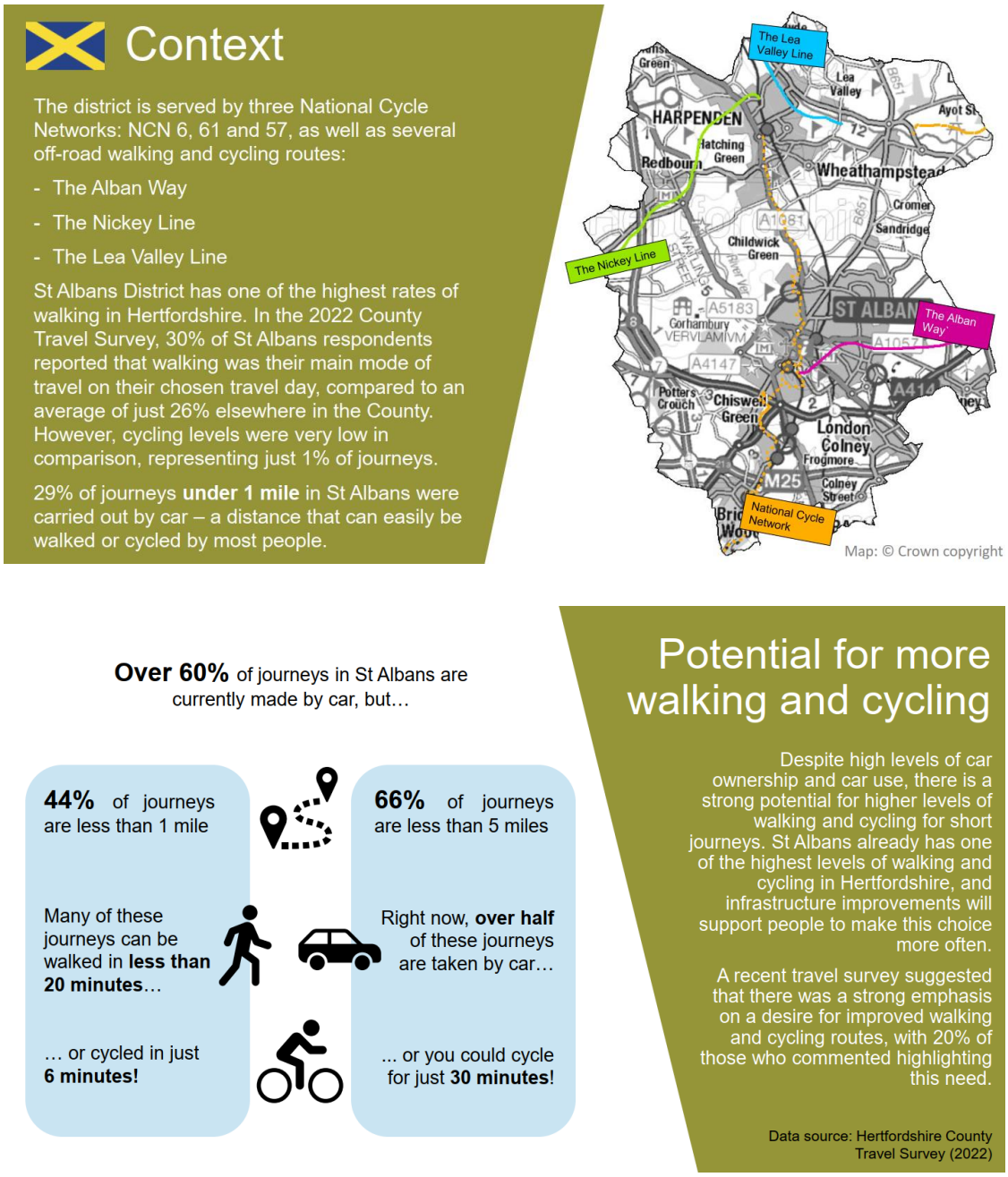
- Short journeys: With over 56% of all trips under five miles or less, there is a significant amount of journeys in Hertfordshire that currently take place by private car which could be undertaken by cycling or walking.
- Urban congestion: Congestion is a significant issue in urban areas, with Watford, and could increase by 20.9% by 2031, based on 2011 levels.
- Active Travel for Schools: Whilst 51% of children walk to nursery or primary school, and 47% walk to secondary school, cycling only accounts for 3% of secondary school trips. Furthermore, in some parts of Hertfordshire, over 23% of children are classified as obese.
- Poor health 'hotspots': Hertfordshire has several key settlements where health indicators are particularly concerning and could be improved through Active Travel.

Funding for active travel is derived from a variety of external and internal sources which include central Government funding, County Capital and Revenue streams, grants, Community Infrastructure Levy (CIL), developer contributions and Member locality budgets.

The St Albans LCWIP

There is a helpful mapping resource showing priority routes for intervention, and these are placed in priority order within the LCWIP Executive Summary. The two infographics below provide a helpful overview.

***Figure G**: Extracts from the St Albans LCWIP Executive Summary*



The Climate Change Committee's 2023 Progress Report to Parliament.

Key messages include:

- A lack of urgency - while the policy framework has continued to develop over the past year, this is not happening at the required pace for future targets. The Net Zero target was legislated in 2019, but there remains a lack of urgency over its delivery. The Net Zero transition is scheduled to take around three decades, but to do so requires a sustained high-intensity of action. This is required all the more due to the slow start to policy development so far. Pace should be prioritised over perfection.
- Planning policy needs radical reform to support Net Zero - the planning system must have an overarching requirement that all planning decisions must be taken giving full regard to the imperative of Net Zero.
- Electrification of heating - the Government needs to overcome the uncertainty being caused by its planned 2026 decision on the role of hydrogen in heating, to accelerate deployment of electric heating and press ahead with low-regret energy infrastructure decisions.
- Built environment energy efficiency - installation rates of energy efficiency measures continue to be below necessary levels and fell further in 2022.

Appendix IV: Growth quanta

Introduction

The aim of this appendix is to supplement the discussion presented in Section 5.2, which introduces 'top down' / strategic factors with a bearing on work to define reasonable alternative growth scenarios.

Specifically, this appendix presents an appraisal of four housing requirement (or 'growth quanta') alternatives:

- 300 dpa (the approximate figure that could be provided for without greenfield Green Belt release)
- 600 dpa (a low growth scenario that might be considered in order to reflect Green Belt constraint)
- 900 dpa (a figure suitably close to standard method LHN)
- 1,200 dpa (a reasonable high growth 'bookend' for testing at this stage in the process)

Appraisal methodology

The appraisal is presented in a table below that includes: a **column** for each of the alternatives; and a **row** for each of the 13 sustainability topic headings that together comprise the core of the SA framework (Section 3).

Within each row the aim is to:

- **rank** the alternatives in order of performance (with a star indicating best performing; "=" indicating broadly equal performance; and "?" indicating an inability to reach a conclusion); and then
- **categorise** performance in terms of 'significant effects' using red / amber / light green / green.[28]

The table is followed by a discussion, explaining reasons for the ranking and predicted effects.

Further methodological points are as follows:

- It is inherently challenging to reach conclusions with any confidence due to the high-level nature of the alternatives, i.e. given no assumptions regarding distribution, let alone specific sites that would be allocated.
- A key assumption is that lower housing growth in St Albans would lead to increased pressure for housing growth elsewhere within a constrained sub-region. However, in practice, there is little certainty.

[28] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

Appraisal findings

The table below present a summary of the appraisal of reasonable growth scenarios presented above. To reiterate, within each row, the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence); and then **2)** categorise performance in terms of 'significant effects' using red / amber / light green / green.

N.B. it is not considered appropriate to simply conclude a preference for lower growth from wide-ranging environmental perspectives, despite the fact that housing growth inevitably leads to environmental impacts. This reflects an assumption that unmet need would have to be provided for elsewhere within a constrained sub-region, and it is not always possible to conclude that St Albans is particularly constrained in the sub-regional context.

Table A: *High level appraisal of growth quanta (housing requirement) alternatives*

Topic	300 dpa	600 dpa	900 dpa	1,200 dpa
	Rank of preference (number) and categorisation of effects (shading)			
Accessibility	4	3	☆1	2
Air and env quality	3	2	☆1	3
Biodiversity	2	☆1	☆1	2
Climate change adaptation	2	2	☆1	2
Climate change mitigation	4	3	☆1	2
Communities and health	4	3	☆1	2
Economy	3	2	☆1	2
Historic environment	2	☆1	2	3
Housing	4	3	2	☆1
Landscape	3	2	☆1	3
Soils / resources	3	2	☆1	2
Transport	4	3	☆1	2
Water	2	2	☆1	2

Summary discussion

The appraisal finds that 900 dpa is preferable in respect of more topics than any of the other scenarios, and is also associated with the greatest number of predicted positive effects and the fewest negatives. However, it does not necessarily follow that 900 dpa is best performing overall, or 'most sustainable'. This is primarily because the appraisal is undertaken without any assumptions regarding the degree of importance, or 'weight' in the decision-making process, that should be assigned to each of the topics that together comprise the SA framework. The appraisal finds an alternative scenario to outperform 900 dpa under two topic headings, and the Council – as decision-makers – might choose to assign particular weight to one or both of these.

A second immediate point to note is that 300 dpa is shown to perform worst, or equal worst, under all of the SA topics. This is a strong indication that this growth quanta scenario performs poorly overall and is perhaps even 'unreasonable'. However, again, it is only the Council that can arrive at a conclusion in this respect. There will be many factors to weigh in the balance other than those taken into account through this high-level appraisal.

Having made these introductory remarks, the following bullet points consider each of the topics in turn:

- **Accessibility (to community infrastructure)** – a key consideration here is supporting one or more strategic growth locations where community infrastructure is delivered alongside housing, in order to 'consume the smoke' of the new community and potentially also address existing issues / identified opportunities.

  A 900 dpa scenario would ensure that the choice, in respect of the balance between strategic and non-strategic growth locations, is in the hands of SADC, as opposed to passing the decision on to another LPA tasked with meeting unmet needs (as well as their own needs) under the 600 dpa and 300 dpa scenarios.

  With regards to the 1,200 dpa scenario, the District's capacity to support strategic growth locations could be reached, such that there is a need to deliver a large number of non-strategic growth locations, with resulting pressure on existing community infrastructure. This conclusion cannot be reached with any certainty, but the fact is that there is a limit to the level of work that has been undertaken to explore strategic site options.

  With regards to effect significance, there are identified growth-related infrastructure opportunities locally, most notably in respect of secondary schools capacity, which might go unrealised under lower growth scenarios.
- **Air and wider environmental quality** – focusing on the location of air quality management areas (AQMAs) across the sub-region (particularly those relating to non-motorway traffic), there is reason to suggest that St Albans is subject to notable constraint, particularly noting the AQMA affecting St Albans High Street.

  In turn, there are significant concerns with a 1,200 home dpa scenario, and a further consideration is potentially the pressure there would be for growth locations adjacent to major roads or railways (which could lead to concerns in respect of noise as well as air pollution). However, concerns are tempered on account of the national switch-over to electric vehicles (EVs), albeit also noting that particulate pollution from brakes, tyres and roads will remain, including as EVs are significantly heavier than combustion engine vehicles.

  With regards to the question of whether the housing requirement should be set at LHN (888 dpa) or a lower figure, there are four further factors. Firstly, there is a need to recognise that exporting unmet need may well lead to increased car-miles, e.g. as residents commute further to work. Secondly, growth in St Albans could well unlock or facilitate delivery of strategic transport infrastructure upgrades, e.g. the A414 corridor strategy. Thirdly, as per the discussion under 'accessibility', there are 'sustainable transport' arguments for supporting strategic growth locations, e.g. masterplanning for 'walkable neighbourhoods'. Finally, there is a need to consider a high density of AQMAs within local authorities directly abutting the North London Boroughs, as well as a blanket AQMA covering the North London Boroughs themselves.
- **Biodiversity** –it is difficult to conclude that St Albans is subject to relatively high constraint in the sub-regional context. However, on the other hand, it is difficult to envisage 'biodiversity' arguments for St Albans receiving unmet needs elsewhere, including given the issue of recreational pressure on the Chilterns Beechwoods SAC. With regards to Dacorum, the first point to make is that the whole district is affected by the Chilterns Beechwoods SAC constraint. More generally, whilst the part of the district within the AONB is constrained (primarily by woodland habitats) there are parts of the district, including around Hemel Hempstead, that are subject to relatively low constraint. With regards to Welwyn Hatfield, the borough is constrained by other SAC woodlands, but issues have been explored and resolved through their plan-making / HRA process.

  On the question of a very low growth scenario (300 dpa), a concern might be that there would be pressure for a focus of growth within the narrow band of non-Green Belt between Luton and Stevenage, where there is a high density of ancient woodland and wood pasture priority habitat. Also, as per the discussion under 'accessibility', there could be pressure for authorities receiving unmet needs to disperse growth widely across smaller sites, potentially leading to opportunities missed in respect of strategic growth-related enhancements / interventions, e.g. targeted at delivering on a Hertfordshire Local Nature Recovery Strategy (LNRS).

Finally, on the matter of significant effects, it is difficult to reach strong conclusions at this stage, primarily on account of the high-level nature of the scenarios, but also given the requirement in the Environment Act to deliver 10% biodiversity net gain (with the potential to require a higher percentage figure through policy).

- **Climate change adaptation** – the district does not stand-out as being subject to particular flood risk constraint, in the sub-regional context. However, on the other hand, it is difficult to envisage flood risk being suggested as a reason for St Albans receiving unmet need from elsewhere. Under a higher growth scenario there could potentially be increased pressure to deliver new homes in locations affected by a degree of flood risk, and higher density development potentially susceptible to overheating is another consideration.
- **Climate change mitigation** – focusing on built-environment decarbonisation, key considerations are the need to direct growth to strategic growth locations; locations where there is the potential for higher density (and ideally mixed use) development; and locations with strong development viability. There are clear opportunities locally in at least two of these respects, hence there is a built environment decarbonisation argument for providing for housing needs in full locally. Also, there may be an opportunity locally in respect of supporting modern methods of construction, in support of minimising non-operational built environment emissions (e.g. embodied carbon in construction materials). There is a need for proactive strategic planning for built environment decarbonisation, as opposed to exporting unmet needs to locations unknown.
- **Communities** – it is recognised that there may be concerns regarding growth quantum among some members of the local community. However, local concerns must be considered in the sub-regional context. For example, there is a need to recognise that without HGC there would be greatly increased pressure for strategic and non-strategic urban extensions, whether within St Albans or elsewhere. It is also important to recall that any unmet needs generated would need to be met as close to St Albans as possible.
- **Economy** – there is clear support for setting the housing requirement at LHN, whilst high growth could worsen the current existing issue of high levels of out commuting. St Albans is home to two of Hertfordshire's main research and innovation assets in the Building Research Establishment (BRE) and Rothamsted Research, St Albans is a thriving location for office-based businesses and there is an opportunity to deliver a strategic expansion of Maylands Industrial Estate at the eastern edge of Hemel Hempstead. In this light, there is a need to provide for new homes suited to well-skilled workers wishing to work in the local area. Also, there is a need to recognise that St Albans is very well-connected to other key employment areas sub-regionally.
- **Historic environment** – it is fair to highlight an argument for a lower growth scenario.
- **Housing** – housing needs locally are quite acute, as discussed within various sections of this report. Reasons for providing for LHN / not exporting unmet need include: 1) housing need should be provided for close to source; 2) there is little certainty regarding when, where or even if unmet need would be provided for; and 3) development viability is high locally, such that there can be good confidence regarding affordable housing delivery. With regards to Scenario 4, there three theoretical benefits: 1) this could assist with meeting affordable housing needs; 2) there would be the potential to provide for unmet need from elsewhere, which could well be an issue, albeit no neighbouring local authorities have formally requested that the St Albans local plan provides for unmet need; and 3) it could be possible to provide for Gypsy and Traveller accommodation needs more fully via strategic urban extensions. However, it is important to consider the capacity of the house building industry to deliver new homes locally (average delivery is under 500 homes).
- **Landscape** – is a constraint locally, mindful of sensitive settlement gaps and also the ongoing Chilterns AONB boundary review. However, neighbouring areas are subject to similar or even greater constraint. Under Scenario 4 there would be a need for extensive growth at locations not recommended for further consideration by the Green Belt Review, albeit it is recognised that Green Belt is not strictly a landscape designation.
- **Soils** – St Albans cannot be said to be particularly constrained in the sub-regional context. For example, the nationally available 'provisional' dataset shows SW Herts to be mostly grade 3 quality land, whilst within NEC Herts there is significant grade 2 quality land, and West Essex is associated with very widespread grade 2 quality land. There is also a need to consider quite extensive minerals safeguarding areas locally.
- **Transport** – there is a clear need to provide for housing needs as close to source as possible, from a transport perspective. Furthermore, early commitment to providing for LHN in full, as opposed to generating unmet need to be provided for elsewhere within a constrained sub-region, is conducive to early and effective strategic transport planning, e.g. planning for sub-regionally significant infrastructure. There are strategic opportunities to direct developer funds towards the achievement of transport infrastructure opportunities, notably the A414.
- **Water** – there is theoretical support for setting the housing requirement at LHN, with a view to early and effective planning for water infrastructure and the wider water environment. However, it could potentially be the case that there are particular constraints affecting St Albans, in terms of water quality and/or water resources, e.g. noting potential issues affecting Maple Lodge STW, which serves a very wide area. There is a need for further engagement with the Environment Agency, Thames Water and Affinity Water.

Appendix V: Sites GIS analysis

Introduction

As discussed in Section 5.3, as a relatively minor step in the process of arriving at reasonable growth scenarios (see Figure 5.1) a long list of site options was subjected to GIS analysis.[29] This was an input to Section 5.4.

The outcome of the analysis is in the form of a large spreadsheet of data, with a row for each of the site options and over 100 columns that present information on the site (e.g. size, name), performance data (e.g. distance to a SSSI) and supplementary information (e.g. name of the nearest SSSI).

The aim of this section is to present insights in respect of the spread of data / trends. In particular, the aim is to consider individual columns within the spreadsheet, identifying site options and groups of site options (e.g. emerging preferred sites versus rejected sites) associated with notable performance.

It is important to be clear that the analysis in this appendix does not attempt to look across any given row within the spreadsheet in order to reach a conclusion on any given individual site option. It would only be possible to take this step after having assigned a weight / degree of importance to each of the performance metrics (columns).

Limitations

GIS analysis of the spatial relationship between sites and various push (e.g. historic environment designations) and pull (e.g. schools) features cannot be considered sophisticated analysis. GIS analysis of site options:

- rarely highlights site-specific issues / opportunities that are not otherwise readily apparent to the specialist; and
- highlights issues / opportunities that are 'theoretical', and which can often be discounted, or assigned limited weight in decision-making, upon closer inspection. For example, where a site is distant from accessible greenspace this can be addressed by delivery of new accessible greenspace onsite.

As such, GIS analysis of site options should not be overly relied upon, at the expense of a focus on qualitative analysis informed by wide ranging evidence, including the views of stakeholders, and professional judgement.

The analysis should certainly not be used as a primary means for arriving at overall conclusions on sites. Any attempt to utilise the analysis in this way would necessitate a process of Multi Criteria Analysis (MCA) whereby a weighting is assigned to each of the performance metrics, and any such process is fraught with challenges.

Structure of this appendix

Set out below is:

- further discussion of methodology;
- discussion of spread of data / trends for specific performance metrics; and
- a table presenting a high level summary of the performance of all site options against the metrics.

Methodology

The first step was to gather GIS data.

- Site options – the Council provided 'red line boundaries' for all HELAA sites. One of the issues / limitations is that large landholdings sometimes get submitted, within which might be contained realistic site options. Also, an issue is that overlapping sites get submitted over time, and it is not necessarily the case that the intention of the landowner is that the most recent submission should supersede the previous submissions.[30]

[29] The analysis was run for all HELAA sites, nine amended HELAA sites and one new site (Land west of Rothamsted Research). Also, it is important to be clear that the sites identified through the Urban Capacity Study were not included in the analysis.
[30] No distinction is made within this appendix to distinguish site options that are likely to be superseded. However, efforts might be taken to do so in the future, as inclusion of superseded sites can serve to skew the analysis. Within Section 5 efforts are made to remove likely superseded sites from maps simply with the intention of ensuring 'clean' and accessible maps.

- Constraint / push and opportunity / pull features - much data is available nationally ('open source') and a range of other data is held by the Council. However, there are a range of potential issues to be mindful of, including data becoming out of date, only being available for certain parts of the District or not being available for neighbouring local authority areas. Gathering data on primary and secondary schools has proved particularly challenging, as discussed further below. Suggestions are welcomed on data sources / best use of data.

The second step was then to run the analysis, i.e. query the spatial relationship between each site option and each push / pull feature (e.g. distance to a listed building, intersect with a flood zone). There are two points to note:

- Distance was measured "as the crow flies" (it can also be possible to calculate distance by road, footpath etc).
- Distance was calculated from the nearest point of each site option.

Having generated the spreadsheet of data, the final step was then to interrogate, utilise and report the data.

Analysis outcomes by metric

The aim here is to present insights into trends across the data for a range of key metrics and summarise the approach taken to categorising / differentiating the performance of site options on a **red** ➔ **light red** ➔ **amber** ➔ **light green** ➔ **green** scale (N.B. this can be referred to as a 'RAG' scale).

Air quality management area (AQMA)

The analysis finds that no sites intersect an AQMA, and the nearest site is 269m distant. This is a small brownfield site. The second closest site is 500m distant, and the greenfield site option located closest to an AQMA is 998m distant (Land at Verulam Golf Club, St Albans).

The average distance of all sites from an AQMA is 4,621m, whilst the average distance of sites 'recommended for further consideration by the Green Belt Review' is 5,311m.

It is very difficult to determine distance thresholds, when seeking differentiate between the performance of sites on a RAG scale, e.g. given that sensitivity relates to traffic flows more so than distance / proximity. As such, it is important to categorise performance on the basis of the spread of data (with a view to differentiating on the basis of relative performance) as-much-if-not-more-so than on the basis of absolute thresholds.

On balance, it is considered appropriate to:

- assign **red** to the 10 sites within 1,000m
- assign **green** to 139 sites beyond 5,000m
- place the remaining 237 sites on a **colour scale** (from light red to light green) according to distance

Special Area of Conservation (SAC)

The closest site option is 7,279m, at which distance the primary concern is recreational pressure. In this respect, there is a need to be mindful of the designated 12.6km recreational impact zone surrounding the Ashridge Woods and Commons SSSI component of the Chilterns Beechwoods SAC. Within this zone there is a need for Suitable Alternative Natural Greenspace (SANG) to be in place to absorb the recreational pressure from new homes.

In this light, **light red** is assigned to all sites within the 12.6km zone, and **green** to all other sites. The great majority of affected sites are located to the east of Hemel Hempstead or at Redbourn, but two 'recommended Green Belt' sites to the west of Harpenden also just about intersect the recreational impact zone.

Some sites are closer to Wormley-Hoddesdon Park Woods SAC than the Chilterns Beechwoods SAC, but the nearest site is 9,560m and there is not a recreational impact zone defined for this SAC.

Site of Special Scientific Interest (SSSI)

Four site options are adjacent to a SSSI. In two cases this is Bricket Wood Common SSSI, which is highly sensitive, and in two cases this is Moor Mill Quarry SSSI, which is a geological SSSI and hence presumably less sensitive.

Of the 73 site options closest to a SSSI, in each case the closest SSSI is either Bricket Wood Common SSSI or Moor Mill Quarry SSSI. Focusing on Bricket Wood Common, 14 site options are within 1,000m, which serves to highlight the need to avoid cumulative effects. Part of the SSSI is in 'unfavourable no change' condition.

It is very difficult to identify distance thresholds. 400m is a well-established threshold for recreational pressure (e.g. dog walkers), which is an important consideration for many SSSIs (but not all), but there are a range of other 'impact pathways' (e.g. hydrological), plus recreational pressure can come from much further afield. Natural England has defined 'impact risk zones' for all SSSIs, but these are very extensive, such that they capture many site options and, in turn, can fail to enable effective differentiation between site options.

On balance, it is considered appropriate to:

- assign **red** to the 33 sites within 1,000m
- assign **green** to 161 sites beyond 5,000m
- place the remaining 192 sites on a **colour scale**

Finally, it is noted that whilst the average distance of the site options that feature within the reasonable alternative growth scenarios (Section 6) is 5,098m, the average distance of the 15 further site options that are 'noted' through the sub-area analysis (Section 5.4) is 3,076m (because several are relatively close to Bricket Wood Common).

Local Wildlife Site (LWS)

This is a local level designation, in contrast to the international and national designations discussed above.

There is an argument for only assigning 'red' to those sites that intersecting (around 60 sites) or adjacent (around 65 sites); however, on balance, it is considered appropriate to:

- assign **red** to the 143 sites within 20m;
- assign **green** to 31 sites beyond 500m; and
- place the remaining 212 sites on a **colour scale**.

The most constrained 'recommended GB' site is Ashdale Lye Lane, Bricket Wood, which intersects a LWS by 76%. Also, another smaller 'recommended GB' site at Bricket Wood intersects by 12%. Seven other 'recommended GB' sites are considered significantly constrained by a LWS.

Overall, emerging preferred sites are 147m distant from a LWS on average, whilst the average distance of other site options is 177m.

Ancient woodland

In all cases where a site option is in proximity to an ancient woodland it is the case that the ancient woodland is also designated as a LWS. As such, distance to an ancient woodland is not shown in the table below.

Priority habitat

On balance, it is considered appropriate to:

- assign **red** to the 29 sites that intersect by more than 50%;
- assign **green** to 208 sites that do not intersect; and
- place the remaining 149 sites on a **colour scale**.

The average intersect of all sites is 9.4% whilst the average intersect of 'recommended GB' sites is 12.5%.

Tree Protection Orders

There are two datasets: 1) individual TPOs; and 2) area TPOs. It was decided appropriate to focus on area TPOs.

On balance, it is considered appropriate to:

- assign **red** to the 15 sites that intersect by more than 50%;
- assign **green** to 308 sites that do not intersect; and
- place the remaining 63 sites on a **colour scale**.

Two 'recommended GB' sites have more than 50% coverage and another has 44% coverage. Also two further such sites are associated with eight or more individual TPOs.

Historic environment designations

The distance thresholds used can be seen in the table below. Other points to note are:

- No emerging preferred sites are in proximity to either a Grade I or Grade II* Registered Park and Garden (two sites at Harpenden are ~2km, including North West Harpenden).
- One emerging preferred strategic site (West of Redbourn) is in proximity to a Grade I parish church (122m). Also, a small emerging preferred site at Wheathampstead is 284m distant from a Grade I parish church.
- Hemel Garden Communities (HGC) includes one Grade 2* listed building (also several Grade II) and there is also a Grade II* listed building closely associated with Burston Garden Centre, How Wood.
- There are 12 Grade II listed buildings within HGC. Only one other emerging preferred site includes a Grade II listed building (Burston Garden Centre, How Wood).
- It is important to recall that the thresholds are set on the basis of the spread of data as much, if not more so, than on the basis of known / potential impact distance thresholds. This is with a view to effective differentiation.
- It is recognised that there are limitations to GIS analysis. The aim is for this simply to be an input to the process of defining reasonable alternatives for appraisal and consultation.

Schools

The County Council maintains a GIS layer / dataset showing the location of all schools. It is helpfully the case that this dataset covers not only St Albans District but also all surrounding districts bar Central Beds to the north, where there are not thought to be any schools that would serve St Albans District to any significant extent.

However, there is a need to carefully prepare the dataset for use, including:

- Differentiate between primary and secondary schools (also accounting for 'all through' schools) and primary schools with and without a nursery (and, in turn, stand-alone nurseries).
- Sift out special educational needs (SEN) schools and fee paying schools.
- Be mindful of selective schools, single sex schools and schools serving particular communities.

The analysis shows some notable trends. With regards to secondary schools, sites at Redbourn, Wheathampstead and Radlett are notably distant, as well as sites in the Harperbury Park area (between Radlett and London Colney). With regards to primary schools, land 'recommended by the GB Review' at Gustard Wood (Wheathampstead sub-area) is notably distant, as is 'recommended' land north of Radlett. It is also notable that there is no primary school in Hatching Green / South West Harpenden area. Finally, it should be noted that there is no primary school at Harperbury Park, but the analysis has taken account of a nearby school serving the Jewish community.

All metrics

Having introduced the broad approach, the table below summarises the RAG-shading approach taken to all 25 performance metrics assigned a column within the table below (N.B. performance was also measured for a range of other metrics, but the outcome of the analysis is of less importance to the task of differentiating site options).

Table A: Thresholds used for classifying performance on a RAG scale

Metric	Red	Light red → light green	Dark green
Air Quality Management Area (AQMA)	<1,000m	Other sites	>5,000m
Special Area of Conservation (SAC)	-	<12,500m from Chilterns Beechwoods = light red	Other sites
Site of Special Scientific Interest (SSSI)	<1,000m	Other sites	>5,000m
Local Wildlife Site (LWS)	<20m	Other sites	>500m
Priority habitat	>50% intersect	Other sites	No intersect
Tree Protection Order (TPO)	>50% intersect	Other sites	No intersect
Scheduled monument	<30m	Other sites	>1,000m

Metric	Red	Light red → light green	Dark green
Conservation area[31]	-	Intersect = light red; no intersect = light green	-
G1 or G2* Registered park/garden (RPG)	<1,000m	Other sites	>3,000m
G2 RPG	<1,000m	Other sites	>3,000m
G1 Listed Building (LB)	<400m	Other sites	>2,000m
Grade 2* LB	<200m	Other sites	>1,000m
G2 LB	<20m	Other sites	>100m
Archaeological record area	-	Intersect = light red; no intersect = light green	-
Chilterns AONB	<1,000m	Other sites	>10,000m
Flood zone 2	>30% intersect	Other sites	<1% intersect
1 in 100 yr surface water flood risk	>30% intersect	Other sites	<1% intersect
Agricultural land[32]	Grade 2	Grade 3 = light red; other = light red	-
Former landfill	-	>5% intersect = light red; other = light green	-
City or town centre	-	Other sites	<2,000
Neighbourhood centre	-	Other sites	<8,000
Secondary school	>2,500m	Other sites	<1,000m
Primary school	>1,200m	Other sites	<400m
Index of Multiple Deprivation (IMD)	-	Light red (more affluent) to light green (less affluent)	-

Analysis outcomes by site option

The table below includes a row for each site option and a column for each of the performance metrics introduced above. It is important to reiterate that the aim is not to predict significant effects, but rather simply to differentiate the relative performance of site options in respect of specific performance metrics. Whilst this can serve to inform consideration of overall performance, for any given site option, the aim of the analysis is not to draw conclusions in this regard (recognising that the metrics are not assigned any weight, nor is it fair to assume equal weight).

Structure of the table

The table presents sites by **sub-area**, then by **status** and then by **size**.

The status categories are:

1. Select sites with planning permission (**P**)
2. Emerging preferred allocations comprising Green Belt PDL (**PDL**)
3. Emerging preferred allocations comprising land recommended by the GB Review (**GBR**)
4. Hemel Garden Communities (the part not recommended by the GB Review) (**HGC**)
5. Other emerging preferred strategic options (not recommended by the GB Review) (**SO**)
6. Non-preferred strategic options that nonetheless feature in the reasonable alternative growth scenarios (Section 6) as a possible 'fallback' in the event that HGC cannot be progressed (**FB**)
7. Non-preferred sites 'noted' in Section 5.4 / Appendix VI (**N**)
8. Other site options

N.B. the ten sites with a HELAA ref ending in '23' were created in 2023, i.e. subsequent to the HELAA.

[31] In a number of cases sites intersect only by a slither (likely a digitising error), such that in practice they are adjacent.
[32] Account is taken of the highest grade land that the site intersects; no account is taken of known urban or PDL sites.

Table B: Site options GIS analysis

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
STS-30-21	St Stephen	Bricket Wood	GBR	3.1																								
STS-57-21	St Stephen	Bricket Wood	GBR	2.5																								
STS-54-21	St Stephen	Bricket Wood	GBR	1.3																								
STS-55-21	St Stephen	Bricket Wood	N	10.5																								
STS-62-21	St Stephen	Bricket Wood	N	9.2																								
STS-31-21	St Stephen	Bricket Wood	N	5.8																								
STS-17-16	St Stephen	Bricket Wood		18.9																								
STS-31-16	St Stephen	Bricket Wood		9.3																								
STS-02-18	St Stephen	Bricket Wood		2.6																								
STS-02-21	St Stephen	Bricket Wood		2.5																								
STS-54-18	St Stephen	Bricket Wood		1.5																								
STS-44-18	St Stephen	Bricket Wood		0.3																								
STS-65-21	St Stephen	Bricket Wood		0.2																								
STS-18-21[33]	St Stephen	Bricket Wood		0.2																								
STS-45-21	St Stephen	Bricket Wood		0.2																								
STS-04-23	St Stephen	C'well Gr, How Wd, Park St / Frogmore	GBR	14.9																								
STS-64-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore	GBR	4.3																								
STS-38-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore	GBR	4.1																								
STS-32-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore	GBR	2.3																								
STS-08-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore	GBR	1.1																								

[33] One of two preferred urban brownfield HELAA sites (Former Bricket Wood United Reformed Church, AL2 3QR).

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
STS-14-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore	N	25.2																								
STS-10-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore	N	13.9																								
STS-66-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore	N	11.5																								
STS-20-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore	N	5.5																								
RF-01a-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		153																								
RF-02-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		119																								
STS-46-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore		92.4																								
RF-01h-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		77.2																								
STS-19-16	St Stephen	C'well Gr, How Wd, Park St / Frogmore		56.5																								
STS-19-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		52.8																								
STS-04-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		27.3																								
STS-14-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore		26.7																								
STS-67-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		25.8																								
RF-01l-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		22.6																								
STS-03-17	St Stephen	C'well Gr, How Wd, Park St / Frogmore		15.5																								
RF-01g-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		14.9																								
STS-53-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		14.4																								
STS-49-17	St Stephen	C'well Gr, How Wd, Park St / Frogmore		12.7																								
STS-56-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		12.3																								
STS-49-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		10.9																								
STS-24-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		10.0																								
STS-47-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		6.6																								
STS-13-16	St Stephen	C'well Gr, How Wd, Park St / Frogmore		6.1																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
STS-06-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		5.8																								
STS-11-17	St Stephen	C'well Gr, How Wd, Park St / Frogmore		5.3																								
STS-21-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore		4.3																								
STS-22-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore		4.2																								
STS-07-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore		3.9																								
STS-12-17	St Stephen	C'well Gr, How Wd, Park St / Frogmore		2.5																								
STS-48-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		2.3																								
STS-37-17	St Stephen	C'well Gr, How Wd, Park St / Frogmore		2.1																								
SM-09-21	St Michael	C'well Gr, How Wd, Park St / Frogmore		2.1																								
STS-35-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		2.1																								
STS-35-16	St Stephen	C'well Gr, How Wd, Park St / Frogmore		2.0																								
STS-26-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		1.4																								
STS-29-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		1.3																								
STS-58-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		1.2																								
STS-60-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		1.1																								
SA-12-18	St Albans	C'well Gr, How Wd, Park St / Frogmore		0.8																								
SA-12-21	St Albans	C'well Gr, How Wd, Park St / Frogmore		0.8																								
SM-06-21	St Michael	C'well Gr, How Wd, Park St / Frogmore		0.7																								
STS-27-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		0.7																								
STS-28-21	St Stephen	C'well Gr, How Wd, Park St / Frogmore		0.5																								
SM-06-16	St Michael	C'well Gr, How Wd, Park St / Frogmore		0.5																								
STS-23-21[34]	St Stephen	C'well Gr, How Wd, Park St / Frogmore		0.5																								

[34] One of two preferred urban brownfield HELAA sites (Greenwood United Reformed Church AL2 3HG).

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
STS-63-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore		0.5																								
STS-68-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore		0.4																								
STS-41-16	St Stephen	C'well Gr, How Wd, Park St / Frogmore		0.2																								
SM-07-21	St Michael	C'well Gr, How Wd, Park St / Frogmore		0.2																								
STS-09-18	St Stephen	C'well Gr, How Wd, Park St / Frogmore		0.1																								
STS-52-16	St Stephen	C'well Gr, How Wd, Park St / Frogmore		0.1																								
SA-04-18	St Albans	C'well Gr, How Wd, Park St / Frogmore		0.1																								
SA-01-21	St Albans	C'well Gr, How Wd, Park St / Frogmore		0.1																								
HT-08-18[35]	Harpenden Town	Harpenden	GBR	11.6																								
WH-02-21[36]	Wheathampstead	Harpenden	GBR	7.2																								
HT-21-21	Harpenden Town	Harpenden	GBR	6.5																								
HT-05-21	Harpenden Town	Harpenden	GBR	4.1																								
WH-32-21	Wheathampstead	Harpenden	GBR	2.3																								
HT-03-23	Harpenden Town	Harpenden	GBR	2.0																								
HT-22-18	Harpenden Town	Harpenden	GBR	1.9																								
HT-13-21	Harpenden Town	Harpenden	GBR	1.9																								
HT-10-23[37]	Harpenden Town	Harpenden	GBR	1.6																								
HT-04-21	Harpenden Town	Harpenden	GBR	1.2																								
HT-11-21	Harpenden Town	Harpenden	GBR	0.9																								
HR-02-18	Harpenden Rural	Harpenden	GBR	0.8																								

[35] The decision was taken to analyse HT-08-18, which is very similar in extent to the land recommended by the GB Review and proposed for allocation. However, Appendix I of the plan document records that the allocation comprises part of HT-07-21.
[36] This is part of the Northeast Harpenden preferred strategic allocation. It is mostly (all bar the northern extent) recommended for further consideration by the Green Belt Review.
[37] The Rothamsted Research, Harpenden Campus preferred allocation.

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
HT-20-21	Harpenden Town	Harpenden	GBR	0.7																								
HT-01-21[38]	Harpenden Town	Harpenden	GBR	0.6																								
HT-12-21	Harpenden Town	Harpenden	GBR	0.6																								
HTWH-1-23[39]	Harpenden T / W'stead	Harpenden	SO	31.4																								
WH-30-21	Wheathampstead	Harpenden	N	65.8																								
HT-07-21	Harpenden Town	Harpenden	N	27.4																								
WH-35-18	Wheathampstead	Harpenden	N	10.2																								
HTWH-1-18	Harpenden T / W'stead	Harpenden		42.8																								
HT-07-18	Harpenden Town	Harpenden		17.1																								
HT-10-21	Harpenden Town	Harpenden		13.6																								
WH-04-18	Wheathampstead	Harpenden		13.1																								
HT-10-18	Harpenden Town	Harpenden		12.3																								
WH-04-21	Wheathampstead	Harpenden		8.8																								
WH-02-16	Wheathampstead	Harpenden		6.8																								
HR-05-16	Harpenden Rural	Harpenden		6.6																								
HT-18-16	Harpenden Town	Harpenden		6.4																								
HT-03-21	Harpenden Town	Harpenden		6.1																								
WH-12-17	Wheathampstead	Harpenden		5.7																								
WH-12-21	Wheathampstead	Harpenden		5.1																								
WH-17-21	Wheathampstead	Harpenden		4.3																								
HT-19-18	Harpenden Town	Harpenden		4.0																								

[38] Part of the Northeast Harpenden preferred strategic allocation.
[39] The full extent of the proposed Northeast Harpenden preferred strategic allocation.

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
WH-32-16	Wheathampstead	Harpenden		3.5																								
WH-40-21	Wheathampstead	Harpenden		3.2																								
HT-27-21	Harpenden Town	Harpenden		3.2																								
HT-22-17	Harpenden Town	Harpenden		2.6																								
HT-30-18	Harpenden Town	Harpenden		2.4																								
WH-01-18	Wheathampstead	Harpenden		2.2																								
HR-08-18	Harpenden Rural	Harpenden		2.0																								
HR-11-21	Harpenden Rural	Harpenden		1.8																								
WH-26-21	Wheathampstead	Harpenden		1.8																								
WH-07-21	Wheathampstead	Harpenden		1.6																								
WH-33-21	Wheathampstead	Harpenden		1.5																								
HR-06-21	Harpenden Rural	Harpenden		1.3																								
HT-29-16	Harpenden Town	Harpenden		1.1																								
WH-16-16	Wheathampstead	Harpenden		1.1																								
WH-16-21	Wheathampstead	Harpenden		1.0																								
HT-24-21	Harpenden Town	Harpenden		0.9																								
HT-28-21	Harpenden Town	Harpenden		0.9																								
HT-06-16	Harpenden Town	Harpenden		0.9																								
WH-16-18	Wheathampstead	Harpenden		0.7																								
WH-08-21	Wheathampstead	Harpenden		0.6																								
WH-14-18	Wheathampstead	Harpenden		0.6																								
HR-12-18	Harpenden Rural	Harpenden		0.6																								
WH-13-18	Wheathampstead	Harpenden		0.5																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
WH-06-17	Wheathampstead	Harpenden		0.5																								
HT-06a-21	Harpenden Town	Harpenden		0.5																								
WH-13-21	Wheathampstead	Harpenden		0.4																								
HT-06b-21	Harpenden Town	Harpenden		0.4																								
HT-25-16	Harpenden Town	Harpenden		0.4																								
HT-15-21	Harpenden Town	Harpenden		0.3																								
WH-11-18	Wheathampstead	Harpenden		0.3																								
HT-14-21	Harpenden Town	Harpenden		0.3																								
HR-10-21	Harpenden Rural	Harpenden		0.2																								
HT-23-18	Harpenden Town	Harpenden		0.2																								
HT-33-17	Harpenden Town	Harpenden		0.2																								
HT-16-16	Harpenden Town	Harpenden		0.2																								
HT-32-17	Harpenden Town	Harpenden		0.2																								
HT-17-21	Harpenden Town	Harpenden		0.2																								
HT-26-21	Harpenden Town	Harpenden		0.1																								
WH-31-18	Wheathampstead	Harpenden		0.1																								
HT-09-21	Harpenden Town	Harpenden		0.0																								
STS-34-21	St Stephen	Harperbury Park	N	92.9																								
STS-34-18	St Stephen	Harperbury Park		141																								
STS-33-17	St Stephen	Harperbury Park		46.0																								
STS-33-18	St Stephen	Harperbury Park		10.6																								
STS-16-21	St Stephen	Harperbury Park		4.1																								
LC-09-21	London Colney	Harperbury Park		2.0																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
R-30-21	Redbourn	North and east of Hemel Hempstead	P	5.6																								
SM-04-18[40]	St Michael	North and east of Hemel Hempstead	GBR	97.2																								
SMR-01-23[41]	St Michael / Redbourn	North and east of Hemel Hempstead	HGC	430																								
SMR-01-21[42]	St Michael / Redbourn	North and east of Hemel Hempstead		417																								
R-02-16	Redbourn	North and east of Hemel Hempstead		162																								
R-02-18	Redbourn	North and east of Hemel Hempstead		146																								
SM-03-16	St Michael	North and east of Hemel Hempstead		137																								
SM-03-18	St Michael	North and east of Hemel Hempstead		98.9																								
R-05-18[43]	Redbourn	North and east of Hemel Hempstead		87.2																								
R-04-21	Redbourn	North and east of Hemel Hempstead		43.2																								
SM-04-16	St Michael	North and east of Hemel Hempstead		35.1																								
R-22-21	Redbourn	North and east of Hemel Hempstead		34.7																								
R-28-17	Redbourn	North and east of Hemel Hempstead		20.3																								
SM-08-21	St Michael	North and east of Hemel Hempstead		9.2																								
R-17-18	Redbourn	North and east of Hemel Hempstead		7.0																								
R-23-18	Redbourn	North and east of Hemel Hempstead		3.8																								
SM-08-18	St Michael	North and east of Hemel Hempstead		2.2																								
R-23-21	Redbourn	North and east of Hemel Hempstead		1.7																								
SM-01-18	St Michael	North and east of Hemel Hempstead		1.7																								
SM-05-18	St Michael	North and east of Hemel Hempstead		1.1																								

[40] Approximately the extent of land recommended for further consideration by the Green Belt Review (all bar the very southern extent of the site).
[41] The full extent of the HGC area in St Albans District.
[42] Part of this site is allocated as East Hemel Hempstead, as East Hemel Hempstead (Central) and Part as East Hemel Hempstead South.
[43] The northern extent of HGC in St Albans District (allocated as North Hemel Hempstead).

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
SM-02-21	St Michael	North and east of Hemel Hempstead		0.5																								
LC-02-23[44]	London Colney	London Colney	SO	38.2																								
LC-14-17	London Colney	London Colney	FB	12.8																								
LC-16-17	London Colney	London Colney	FB	8.4																								
LC-15-17	London Colney	London Colney	FB	6.8																								
LC-10-17	London Colney	London Colney	N	8.1																								
LC-02-21	London Colney	London Colney		86.4																								
LC-01-21	London Colney	London Colney		33.0																								
STS-36-18	St Stephen	London Colney		28.4																								
LC-08-21	London Colney	London Colney		27.4																								
RF-01b-21	London Colney	London Colney		27.4																								
RF-01d-21	St Stephen	London Colney		27.1																								
RF-01m-21	St Stephen	London Colney		26.1																								
LC-04-16	London Colney	London Colney		20.7																								
LC-06-21	London Colney	London Colney		8.6																								
LC-11-18	London Colney	London Colney		4.6																								
RF-01c-21	London Colney	London Colney		4.2																								
LC-17-18[45]	London Colney	London Colney		1.3																								
LC-13-17	London Colney	London Colney		0.8																								
LC-12-21[46]	London Colney	London Colney		0.7																								

[44] Amended version of LC-02-21 comprising the preferred housing and school site.
[45] One of two preferred urban greenfield HELAA sites (East of Morris Recreation Ground, adjacent to A1081 and White Horse Lane) .
[46] One of two preferred urban greenfield HELAA sites (Land South West of London Colney Allotments, AL2 1RG).

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
LC-03-21	London Colney	London Colney		0.3																								
LC-07-18	London Colney	London Colney		0.3																								
LC-05-18	London Colney	London Colney		0.1																								
CH-31-21	Colney Heath	Other	P	5.2																								
HR-09-18	Harpenden Rural	Other		157																								
HR-07-18	Harpenden Rural	Other		111																								
RH-01-16	Redb'n / Harpenden R	Other		70.5																								
CH-14-21	Colney Heath	Other		43.5																								
CH-02-18	Colney Heath	Other		25.1																								
STS-25-21	St Stephen	Other		22.5																								
CH-26-21	Colney Heath	Other		18.8																								
CH-06a-21	Colney Heath	Other		18.0																								
STS-40-18	St Stephen	Other		16.7																								
CH-06b-21	Colney Heath	Other		13.1																								
CH-03-21	Colney Heath	Other		10.6																								
RF-01f-21	St Stephen	Other		9.4																								
CH-37-21	Colney Heath	Other		7.7																								
HR-01-18	Harpenden Rural	Other		7.5																								
RF-01e-21	St Stephen	Other		5.4																								
CH-23-21	Colney Heath	Other		5.2																								
CH-04-21	Colney Heath	Other		4.3																								
HR-03-18	Harpenden Rural	Other		3.9																								
CH-17-21	Colney Heath	Other		3.9																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
CH-22-18	Colney Heath	Other		3.6																								
CH-22-21	Colney Heath	Other		3.2																								
STS-59-21	St Stephen	Other		2.1																								
WH-29-21	Wheathampstead	Other		1.6																								
STS-15-21	St Stephen	Other		1.3																								
CH-24-21	Colney Heath	Other		1.2																								
STS-15-18	St Stephen	Other		1.2																								
CH-07-21	Colney Heath	Other		1.1																								
HR-04-18	Harpenden Rural	Other		1.1																								
CH-07a-16	Colney Heath	Other		0.9																								
CH-21-18	Colney Heath	Other		0.9																								
STS-43-21	St Stephen	Other		0.6																								
STS-39-18	St Stephen	Other		0.4																								
CH-07b-16	Colney Heath	Other		0.2																								
CH-32-17	Colney Heath	Other		0.1																								
STS-51-23	St Stephen	Radlett	GBR	11.8																								
STS-51-21	St Stephen	Radlett		20.1																								
STS-50-18	St Stephen	Radlett		7.4																								
STS-50-21	St Stephen	Radlett		5.2																								
STS-50-16	St Stephen	Radlett		4.3																								
STS-42-18	St Stephen	Radlett		3.8																								
STS-61-21	St Stephen	Radlett		0.5																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
R-03/06-23[47]	Redbourn	Redbourn	GBR	27.4																								
R-18-21	Redbourn	Redbourn	GBR	12.6																								
R-09-21	Redbourn	Redbourn	N	41.4																								
R-09-18	Redbourn	Redbourn		44.1																								
R-12-16	Redbourn	Redbourn		33.0																								
R-12-18	Redbourn	Redbourn		21.4																								
R-12-21	Redbourn	Redbourn		18.5																								
R-03-18	Redbourn	Redbourn		15.9																								
R-03-21[48]	Redbourn	Redbourn		14.9																								
R-06-21[48]	Redbourn	Redbourn		14.0																								
R-18-18	Redbourn	Redbourn		13.5																								
R-06a-16	Redbourn	Redbourn		11.7																								
R-19-16	Redbourn	Redbourn		9.9																								
R-13-21	Redbourn	Redbourn		4.7																								
R-01-21	Redbourn	Redbourn		2.8																								
R-10-16	Redbourn	Redbourn		2.6																								
R-06b-16	Redbourn	Redbourn		2.3																								
R-07-21	Redbourn	Redbourn		2.3																								
R-20-21	Redbourn	Redbourn		2.3																								
R-26-21	Redbourn	Redbourn		1.7																								
R-16-21	Redbourn	Redbourn		1.4																								

[47] The full extent of the West Redbourn preferred strategic allocation.
[48] Part of the West Redbourn preferred strategic allocation.

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
R-11-21	Redbourn	Redbourn		1.0																								
R-21-21	Redbourn	Redbourn		0.9																								
R-15-18	Redbourn	Redbourn		0.6																								
R-08-21	Redbourn	Redbourn		0.6																								
R-25-21	Redbourn	Redbourn		0.5																								
R-27-18	Redbourn	Redbourn		0.5																								
R-24-16	Redbourn	Redbourn		0.4																								
R-14-17	Redbourn	Redbourn		0.2																								
R-29-17	Redbourn	Redbourn		0.1																								
SA-22-21	St Albans	St Albans	P	5.1																								
CH-30-21	Colney Heath	St Albans	PDL	3.3																								
SA-20-21	St Albans	St Albans	PDL	1.9																								
CH-36-21	Colney Heath	St Albans	GBR	20.8																								
SA-18-21	St Albans	St Albans	GBR	5.8																								
CH-01-21	Colney Heath	St Albans	GBR	3.3																								
SA-07-21	St Albans	St Albans	GBR	3.2																								
CH-12-21	Colney Heath	St Albans	GBR	1.4																								
SA-10-16[49]	St Albans	St Albans	SO	39.4																								
SAN-06-23[50]	Sandridge	St Albans	SO	21.8																								
CH-27-23	Colney Heath	St Albans	FB	57.6																								

[49] There are three similar versions of SA-10, dated 2016, 2018 and 2021. The decision was taken to analyse SA-10-16, which *does not* include land with planning permission for 150 homes (ref. 5/2021/0423), which is HELAA site SA-22-21 (approximately). However, the decision has been taken to allocate part of SA-10-21, which *does* include the area of land with planning permission.

[50] An amended version of SAN-06-21 (to remove the long access road).

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
SAN-16-21	Sandridge	St Albans	FB	30.2																								
SAN-14-21	Sandridge	St Albans	FB	24.9																								
SAN-12a-21	Sandridge	St Albans	FB	24.2																								
SA-25-21	St Albans	St Albans	FB	14.1																								
SAN-24-21	Sandridge	St Albans	FB	10.7																								
SANCH-01-23	Sandridge / Colney H'th	St Albans	N	108																								
SA-21-21	St Albans	St Albans	N	11.7																								
SANCH-01-18	Sandridge / Colney H'th	St Albans		144																								
SMSA-01-17	St Michael / St Albans	St Albans		133																								
SMSA-01-18	St Michael / St Albans	St Albans		117																								
CH-27-21	Colney Heath	St Albans		97.3																								
SMSA-02-21	St Michael / St Albans	St Albans		85.7																								
SAN-01-18	Sandridge	St Albans		69.0																								
STS-01-17	St Stephen	St Albans		65.0																								
CH-35-21	Colney Heath	St Albans		53.2																								
SA-10-21[49]	St Albans	St Albans		49.2																								
SA-10-18[49]	St Albans	St Albans		44.7																								
STS-01-18	St Stephen	St Albans		37.7																								
RF-01k-21	St Albans	St Albans		33.7																								
SMSA-03-21	St Michael / St Albans	St Albans		29.6																								
SAN-12b-21	Sandridge	St Albans		24.2																								
SAN-06-21	Sandridge	St Albans		23.7																								
CH-10-21	Colney Heath	St Albans		23.0																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
SAN-08-18	Sandridge	St Albans		20.8																								
CH-25-21	Colney Heath	St Albans		19.5																								
RF-01j-21	St Albans	St Albans		15.3																								
SAN-23-21	Sandridge	St Albans		14.1																								
SA-26-21	St Albans	St Albans		13.9																								
SAN-05c-21	Sandridge	St Albans		12.8																								
CH-13-16	Colney Heath	St Albans		11.2																								
SAN-09-18	Sandridge	St Albans		10.0																								
SAN-04-21	Sandridge	St Albans		9.9																								
SAN-05a-21	Sandridge	St Albans		9.0																								
SA-16-21	St Albans	St Albans		9.0																								
SAN-03-21	Sandridge	St Albans		8.9																								
SAN-05b-21	Sandridge	St Albans		8.7																								
SAN-04-18	Sandridge	St Albans		8.7																								
CH-38-17	Colney Heath	St Albans		7.6																								
SAN-17-18	Sandridge	St Albans		7.3																								
SA-09-18	St Albans	St Albans		7.1																								
SAN-15-21	Sandridge	St Albans		7.0																								
CH-08-16	Colney Heath	St Albans		7.0																								
SA-16-18	St Albans	St Albans		5.7																								
SAN-09-21	Sandridge	St Albans		5.5																								
CH-34-16	Colney Heath	St Albans		4.3																								
CH-29-21	Colney Heath	St Albans		4.1																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
SAN-20-21	Sandridge	St Albans		4.0																								
SAN-20-18	Sandridge	St Albans		3.8																								
RF-01i-21	St Albans	St Albans		3.2																								
CH-05-16	Colney Heath	St Albans		3.0																								
CH-11-21	Colney Heath	St Albans		2.7																								
SA-03-21	St Albans	St Albans		2.4																								
CH-33-18	Colney Heath	St Albans		2.2																								
SA-05-18	St Albans	St Albans		2.2																								
SA-05-16	St Albans	St Albans		2.1																								
SAN-02-16	Sandridge	St Albans		2.0																								
SAN-02-21	Sandridge	St Albans		1.9																								
SAN-10-21	Sandridge	St Albans		1.9																								
SAN-21-18	Sandridge	St Albans		1.4																								
SA-28-16	St Albans	St Albans		1.4																								
CH-16-18	Colney Heath	St Albans		1.2																								
SAN-07-18	Sandridge	St Albans		1.2																								
CH-20-21	Colney Heath	St Albans		1.1																								
CH-39-21	Colney Heath	St Albans		1.0																								
CH-15-18	Colney Heath	St Albans		0.9																								
SAN-19-17	Sandridge	St Albans		0.8																								
SA-30-21	St Albans	St Albans		0.7																								
SA-19-21	St Albans	St Albans		0.7																								
SA-27-18	St Albans	St Albans		0.7																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
SA-14-21	St Albans	St Albans		0.6																								
SA-17-21	St Albans	St Albans		0.6																								
SA-08-16	St Albans	St Albans		0.6																								
SA-29-17	St Albans	St Albans		0.5																								
SA-02-21	St Albans	St Albans		0.4																								
SAN-22-18	Sandridge	St Albans		0.4																								
CH-18-21	Colney Heath	St Albans		0.4																								
SA-13-21	St Albans	St Albans		0.4																								
SA-24-21	St Albans	St Albans		0.3																								
SAN-13-21	Sandridge	St Albans		0.3																								
SAN-18-18	Sandridge	St Albans		0.2																								
CH-09-18	Colney Heath	St Albans		0.2																								
SA-06-21	St Albans	St Albans		0.2																								
SA-23-21	St Albans	St Albans		0.2																								
SM-10-18	St Michael	St Albans		0.1																								
CH-19-21	Colney Heath	St Albans		0.1																								
SA-11-21	St Albans	St Albans		0.1																								
SA-15-18	St Albans	St Albans		0.0																								
WH-24-17	Wheathampstead	Wheathampstead	GBR	5.7																								
WH-10-18	Wheathampstead	Wheathampstead	GBR	4.6																								
WH-28-21	Wheathampstead	Wheathampstead	GBR	3.6																								
WH-03-21	Wheathampstead	Wheathampstead	GBR	1.0																								
WH-22-17	Wheathampstead	Wheathampstead	GBR	0.3																								

HELAA ref.	Parish / unparished area	Sub-area	Status	Area (ha)	AQMA	SAC	SSSI	LWS	Priority habitat	TPO	Scheduled monument	Conservation area	Grade 1 or 2* RPG	Grade 2 RPG	Grade 1 LB	Grade 2* LB	Grade 2 LB	Archaeology	AONB	Fluvial flood zone	Surface water FZ	Agricultural land	Former landfill	City or town centre	Neighbourhood centre	Secondary school	Primary school	Multiple deprivation
WH-05-21	Wheathampstead	Wheathampstead		57.9																								
WH-18-21	Wheathampstead	Wheathampstead		14.1																								
WH-09-16	Wheathampstead	Wheathampstead		8.5																								
WH-25-21	Wheathampstead	Wheathampstead		7.3																								
WH-21-18	Wheathampstead	Wheathampstead		7.1																								
WH-23-21	Wheathampstead	Wheathampstead		4.7																								
WH-19-21	Wheathampstead	Wheathampstead		3.7																								
WH-20-16	Wheathampstead	Wheathampstead		3.2																								
WH-36-21	Wheathampstead	Wheathampstead		2.1																								
WH-34-21	Wheathampstead	Wheathampstead		1.9																								
WH-27-18	Wheathampstead	Wheathampstead		1.8																								
WH-39-18	Wheathampstead	Wheathampstead		1.4																								
WH-03-18	Wheathampstead	Wheathampstead		1.4																								
WH-15-17	Wheathampstead	Wheathampstead		0.8																								
WH-38-18	Wheathampstead	Wheathampstead		0.4																								
WH-37-17	Wheathampstead	Wheathampstead		0.2																								

Appendix VI: Sub-area scenarios

Introduction

The aim of this appendix is to present the detailed work sitting behind the summary findings presented in Section 5.4, which deals with sub-area scenarios. The aim of Section 5.4 is to conclude on sub-area scenarios that should be taken forward to Section 5.5, where sub-area scenarios are combined to form reasonable alternative growth scenarios for the district / local plan as a whole (which are then appraised in Section 6).

What sub-areas?

There is a need to define sub-areas taking into account the pattern of settlement (first-and-foremost), parish boundaries and the distribution of realistic site options. The following sub-areas were defined:

- North and east of Hemel Hempstead
- St Albans (inc. Colney Heath)
- Harpenden
- London Colney
- Redbourn
- Wheathampstead (inc. Gustard Wood)
- Bricket Wood
- Chiswell Green, How Wood and Park Street / Frogmore
- Edge of Radlett (N.B. Radlett is within Hertsmere District)

Methodology

The aim of the detailed review presented in Appendix VI is to conclude on reasonable sub-area scenarios that need to be taken forward to Section 5.5 of the report, where sub-area scenarios are combined in order to arrive at reasonable growth scenarios for the district as a whole.

The aim is *not* to present a formal appraisal of reasonable alternatives. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to precisely the same level of detail, but rather to focus attention on those options (and site combinations / scenarios) *judged* to be a more marginal, i.e. where the question of whether or how to take the option forward is more finely balance. This approach is taken mindful of the legal requirement, which is to explain reasons for arriving at reasonable alternatives in "outline" terms.

Further methodological points are as follows:

- Green Belt – for all of the settlements there is a clear case for at least exploring Green Belt release. Strategic arguments are higher for some settlements than others, but there are also site specific arguments. A key focus is discussion of those land parcels "recommended for further consideration by the Green Belt Review" (or simply 'recommended'). Also, it should be noted that 'recommended' land parcels do not always align fully with HELAA sites. As such, the discussions below focus on HELAA sites intersecting a 'recommended' land parcel.
  - When considering Green Belt release options the first port of call is: A) HGC; and B) strategic urban extension options comprising land recommended for further consideration by the Green Belt Review.
  - The next port of call is then A) sites *not* recommended for further consideration by the Green Belt Review (or, at least, not in full) but where there is the potential to deliver a strategic urban extension to include targeted new / upgraded infrastructure; and B) non-strategic sites 'recommended' by the GB Review.
  - Other Green Belt options then perform less well; however, there is nonetheless a need to explore further options, given the extent of housing needs and wider arguments for higher growth in specific sub-areas (including in response to arguments for lower growth in other sub-areas). There is a focus on HELAA sites; however, the possibility of growth involving land outside of HELAA sites cannot be entirely discounted.
- Number of scenarios – whilst most of the sub-area scenarios are associated with many feasible scenarios there is a pragmatic need to keep the number to a minimum, and also to apply a degree of methodological consistency, all with the aim of ensuring a manageable and understandable / accessible process.

- Overlapping sites – in many instances two or more 'versions' of a site have been submitted since 2016. The earlier version may well be 'superseded', but this is not known. A pragmatic approach is taken, applying discretion with the aim of avoiding discussion of numerous very closely related site options.
- Maps – of the site options are available by parish on the Council's HELAA webpage.

North and east of Hemel Hempstead

Land falls within the Redbourn Parish and St. Michael Parish.

All land adjacent to the east of Hemel Hempstead (or 'Hemel') is available for development, and the great majority is under close consideration as part of the Hemel Garden Communities (**HGC**) programme.

As discussed in Section 5.2, there are very strong strategic arguments for HGC. Without HGC progressing the St Albans Local Plan could prove challenging and there would be major sub-regional implications.

However, there are also a range of issues, most notably:

- Recreational pressure on the Ashridge Woods and Commons SSSI component of the Chilterns Beechwoods SAC - a Mitigation Strategy has been agreed, but Natural England may nonetheless wish to see work exploring scenarios that would involve avoidance of the issue (as opposed to mitigation).
- Green Belt sensitivity - only part of the land in question is recommended for further consideration by the Green Belt Review (see Figure 5.11). Specifically, the review 'recommends' land adjacent to M1 J8 (A414), which is under consideration for employment land, and also land directly adjacent to the south (east of Leverstock Green), which is under consideration for housing. Other land is more sensitive in Green Belt terms (which serves to 'raise the bar' in respect of the weight of evidence required to justify allocation).[51]

Finally, with regards to land outside of the HGC boundary:

- West of Cherry Tree Lane – has planning permission for 600 homes (primarily within Dacorum) plus land for a primary school, a local centre and employment. The western part of the site is under construction.
- Land to the southwest of the A4147 - is earmarked for a secondary school to meet the long term needs of Hemel Hempstead (this is shown on HGC masterplans). The land is sensitive in Green Belt terms.

In **conclusion**, in addition to the max growth option for the St Albans District component of HGC, which would involve ~4,750 homes in the plan period and ~5,500 in total, there is also a need to consider lower growth. No specific work has been undertaken through the HGC programme on this; however, there is an argument for exploring a scenario involving only land 'recommended for further consideration' through the GB Review (i.e. land either side of M1 Junction 8). This would involve delivering 740 homes plus strategic employment land.

With regards to the option of nil growth, this can be ruled out as 'unreasonable' at this stage in the process, mindful of strategic factors (Section 5.2) including: Hemel's place in the settlement hierarchy; the importance of delivering strategic employment land at this location; and a need to support HGC and wider sub-regional strategy, including for the A414 corridor. Also, it is clearly the case that nil growth would lead to increased pressure for urban extensions to St Albans and/or lower tier settlements in the district.

Table A: *Summary of North and east Hemel growth scenarios to progress to Section 5.5.*

Scenario		Homes	
		Non-Green Belt	Green Belt
1)	Only land parcels 'recommended' by the GB Review	148 [Commitments only][52]	740
2)	HGC in full (N.B. additional growth beyond the plan period)		4,750
Other scenarios? Other scenarios involving growth between 740 and 4,750 homes could warrant further consideration.			

[51] Also, it is important to note that there will be the potential to mitigate harm to the Green Belt (through masterplanning, landscaping and design) and compensate by enhancing remaining Green Belt (as discussed within the Green Belt Review). Most notably, a large swathe of land to the southwest of Redbourn is either proposed for SANG or set to be retained as agricultural land (on the basis that there is no HELAA site), such that a settlement gap to Redbourn would be retained under any scenario.
[52] There is also a windfall assumption for the GB as a whole.

St Albans

Land falls within Colney Heath Parish, Sandridge Parish, St. Michael Parish and unparished St Albans.

As the district's primary town there is a clear need to direct a good proportion of growth to St Albans, with no headline reasons in support of a very low growth strategy (with commensurately higher growth elsewhere, likely within the Green Belt). For example: St Albans is not particularly constrained in biodiversity terms (less so than several other towns in the sub-region); there is good rail connectivity; and, whilst road infrastructure is an issue, there is also an opportunity in the form of the A414 corridor.

When considering reasonable growth scenarios, the 'bottom-up' starting point is supply from:

- Planning permissions - total 731 homes (includes 20 at Sandridge and Smallford), which is 52% of the total district-wide figure, which is broadly in line with the proportion of the district's housing stock in St Albans (54%).
- Windfall – refers to sites that will deliver in the plan period despite not being a local plan allocation (over-and-above planning permissions). Work has been undertaken to breakdown the total district-wide windfall assumption, with the conclusion reached that 1,787 homes (includes 29 at Sandridge) can be anticipated.
- Brownfield urban supply – sites are supported for 611 homes in total (72% of the district total).

These sources of **non-Green Belt** supply total 3,280 homes.

With regards to **Green Belt** options, the first point to make is that there is a clear strategic argument for Green Belt release at St Albans, including given a need to test the option of not delivering HGC in full.[53]

Options can be placed into a *broad* sequential order of preference:

- A starting point is **Glinwell, Hatfield Road** strategic urban extension, located at the far eastern edge of St Albans (Smallford). Land here primarily comprises a series of glasshouses (Glinwell Plc), with an area of greenspace to the west (associated with a stream, known as Butterwick Brook). Land here is recommended for further consideration by the Green Belt Review *and* there is the potential to deliver a strategic scale scheme (**436 homes**), *potentially* to include a new primary school. Another factor in support of development is the previously developed nature of the majority of the site; however, on the other hand, this also leads to challenges, including given the value of the existing greenhouses. Beyond this there are other challenges associated with growth here (see Section 6); however, on balance the option of growth here is considered to be a sequentially preferable Green Belt option at St Albans.
- Second, there are four **non-strategic HELAA sites** recommended by the GB Review and not associated with any clear barriers to allocation. One is notably associated with an area of priority habitat, but benefits from good proximity to the town centre. Two are adjacent to the St Albans Conservation Area, but there should be good potential to avoid/mitigate impacts. Allocation of all four sites in combination would deliver **229 homes**.
- Third, is **East St Albans** strategic urban extension, which comprises a series of agricultural fields adjacent to the northwest of Oaklands College, to the south of Sandpit Lane and east of a recent housing site (Osprey Drive). Whilst the site is sensitive in Green Belt terms (it was highlighted through the Green Belt Review Stage 1, but Stage 2 does not recommend it for further consideration), there is a considerable growth opportunity, including in respect of delivering a new secondary school,[54] a primary school and improvements to Oaklands College. It should also be noted that this was a proposed strategic allocation in the previous version of the St Albans Local Plan as withdrawn in 2020. Other considerations (including agricultural land-related) are discussed in Section 6. The assumption is a scheme involving **522 homes**.
- Fourth, is **North St Albans** strategic urban extension, which comprises agricultural fields to the east of Harpenden Road (east a recently permitted scheme for 150 homes; ref. 5/2021/0423) and north of St Albans Girls School and St Albans Enterprise Centre. The site comprises part of HELAA site SA-10-21, specifically all bar the northern-most part (north of the tree belt). Whilst the site is sensitive in Green Belt terms (it was highlighted through the Green Belt Review Stage 1, but not 'recommended' by the Stage 2 study), there is a considerable growth opportunity (albeit less than East St Albans), including in respect of delivering a

[53] District-wide there is in the region of 5,200 homes supply that can be identified without Green Belt release, whilst a reasonable low growth housing requirement might be in the region of 500 dpa (for arguments sake, albeit recognising that there are arguments for lower growth still), such that there is a requirement for 8,300 homes over the plan period (plus there would be a need for a supply buffer). As such, under a reasonable low growth scenario without HGC (i.e. involving only 740 homes within the East of Hemel sub-area) there would be a need for in the region of 2,700 homes from Green Belt sites at settlements other than Hemel Hempstead. Under this scenario there would be a clear argument for growth via Green Belt release at St Albans.

[54] There is an understanding with the landowner – Oaklands College – that land would be made available for a secondary school, but discussions are ongoing in respect of where this would be delivered. The likelihood is that the school would be delivered outside of the site (i.e. outside of HELAA site SAN-06-21), therefore leading to additional Green Belt impacts.

neighbourhood centre and new strategic cycle infrastructure in line with the LCWIP. Another consideration is that the land has been surveyed in detail and been found to mainly comprise grade 3a quality land (i.e. the lowest grade classed as best and most versatile, BMV). The assumption is **996 homes**.

- Fifth (should there be a need to pass this far down the list of growth options placed in a broad sequential order of preference) are the following strategic urban extension options:
  - **Expanded North St Albans** strategic urban extension – this would deliver a new secondary school (N.B. not necessarily to address any significant existing need in the area) and might serve to ensure a suitably rounded new northern urban edge to St Albans (as opposed to the urban edge extending much further north to the west of the railway than to the east). However, there is no certainty regarding the form that an expanded scheme would take, and there is a clear transport constraint, as there is limited or no potential to upgrade the B651 (a historic route linking St Albans to Sandridge).

    Topography is also potentially a key factor, with Sandridgebury Lane following the course of a shallow valley, and with land rising to the north to a high point (the Hertfordshire Way and edge of Heartwood Forest). Other key considerations include: the setting of the Sandridge Conservation Area; Sandridgebury Lane itself (leading to Sandridgebury); and copses, tree belts and mature hedgerows within the landscape that might be utilised as part of a new defensible Green Belt boundary.
  - **South East St Albans** strategic urban extension – land benefits from reasonable proximity to the city centre and train station, as well as good access to the strategic road network, but this is a sensitive landscape gap between St Albans and London Colney. There would be a clear need to retain the southern part of this land parcel as a gap in perpetuity, and the potential to define a strong new Green Belt boundary can be envisaged, but clearly there would be a significant erosion of the current gap.
  - **Expanded East St Albans** strategic urban extension - the possibility of comprehensive growth to the east of St Albans (including the two sites discussed above) might be envisaged, such that Oaklands Lane is utilised as the new defensible Green Belt boundary. However, biodiversity is a key constraint, with a series of valued woodlands in this area (including two Local Wildlife Sites (LWS), one of which comprises ancient woodland), which may link functionally to other woodlands in the wider landscape (to the east). Another consideration is that much of the land has been surveyed in detail and been found to comprise a mixture of grade 2, grade 3a and grade 3b quality agricultural land.

    The possibility of a modestly expanded east of St Albans strategic urban extension might also be considered, e.g. only involving additional land directly to the north and/or south of Oaklands College, but there might be limited additional benefit in infrastructure terms, mindful that the smaller strategic urban extension option (as discussed above) would deliver a secondary school.
- **Other options** perform less well, and so can be ruled-out with relative ease, given sequentially preferable sites and given an understanding of the number of new homes that would be needed at St Albans under any reasonably foreseeable scenario.

  With regards to other land parcels recommended for further consideration by the Green Belt Review: two are schools and neither is a HELAA site; one is a LWS and not a HELAA site; one is associated with priority habitat adjacent to the River Ver and not a HELAA site; one is a leisure centre, and not a HELAA site; and one is proposed for biodiversity / greenspace.

  With regards to those non-strategic site options that are not recommended for further consideration by the GB Review, sites of note are those adjacent to the north of the A414, at the southern extent of St Albans, which benefit from a degree of containment and relative proximity to the city centre.

There is also the specific matter of two small **PDL sites** in the GB not considered by the Green Belt Review. All are associated with specific issues, such that it is difficult to suggest where they should rank in a list of growth options for St Albans. The sites are as follows:

- SA-20-21 – comprises the Albert Bygrave Retail Park, adjacent to the north of the A414. A 64 home scheme would link quite poorly to a settlement (whether St Albans or London Colney).
- CH-30-21 – comprises a light industrial area (Smallford Works) adjacent to Sleapshyde, which is a small rural settlement (washed over by the Green Belt) adjacent to the north of the A414, between St Albans, Hatfield and Colney Heath. The site, which has a capacity of 80 homes, is located within walking distance of the Glinwell strategic urban extension option discussed above, and there is currently a narrow footpath along the road linking the two sites, which might feasibly be enhanced.

Finally, there is a need to briefly consider **Colney Heath**, a lower order settlement where there no land parcels recommended for further consideration by the Green Belt Review, but a number of sizeable HELAA sites being actively promoted. Indeed, two significant planning applications for a total of 195 homes were refused by Planning Committee on 22nd May 2023 (see items 5 and 6 here; also reported in the local press here). The smaller of the two sites would benefit from proximity to the village primary school and the A414, but both sites are clearly problematic in Green Belt terms. Also, the larger of the two sites would be in proximity to a site that gained planning permission for 100 homes at appeal in 2021 (despite comprising land within the Green Belt) after a planning inspector gave particular weight to the extent of housing need locally (the site will deliver 45% affordable housing and also 10% self-build).

In **conclusion**, there are many feasible growth scenarios for St Albans, hence there is a need to take a pragmatic approach. On balance:

- A reasonable starting point is non-Green Belt supply (3,291 homes) plus allocation of the two Green Belt PDL sites for a total of 144 homes. This is arguably an unreasonably low growth scenario for St Albans, e.g. given its place in the settlement hierarchy; however, it is considered necessary to test this scenario in order to minimise the risk of challenge.
- The next logical scenario to test would involve additional allocation of all sites comprising land recommended for further consideration by the Green Belt Review.
- The next logical scenario to test would involve additional allocation of the two sequentially preferable strategic urban extensions involving land *not* recommended for further consideration by the Green Belt Review.
- It is also considered necessary and appropriate to test a higher growth scenario, but it is difficult to pin-point what site or sites should be additional allocated. On balance, it is considered reasonable to test a higher growth scenario involving additional allocation of:
  - Expanded North St Albans – the assumption is this would deliver 2,170 homes (over and above the 996 scheme discussed above, plus there is an existing committed scheme for 150 homes). However, in practice, there would be a clear argument for exploring lower growth. The assumption is that there would be a focus of growth to the east of the railway line. However, in practice there might also be the potential to explore an expanded scheme to the west of the railway line, i.e. expanding 'North St Albans' further to the north.
  - South East St Albans – in addition to the matters discussed above, another consideration is that there is merit to exploring the possibility of allocating this site in combination with growth to the north east of London Colney, which is an option discussed within the London Colney section below. Accounting for the clear need to maintain a Green Belt gap to London Colney, a potential site of 37 ha can be identified, such that the site might yield in the region of 880 homes.

Table B: *Summary of St Albans growth scenarios to progress to Section 5.5.*

Scenario		Homes	
		Non-Green Belt	Green Belt[55]
1)	Low growth	3,280 [Commitments, windfall & urban supply]	144
2)	Scenario 1 plus sites recommended by the GB Review		809
3)	Scenario 2 plus strategic growth to the north and east		2,326
4)	Scenario 3 plus growth to the north and growth to the SE		5,676
Other scenarios? There are many other scenarios that could feasibly be defined, but there is a need to take a pragmatic approach. One option not included in the scenarios above, but which might feasibly be given further consideration, is the option of an expanded strategic scheme to the east of St Albans. Also, there is a need to further consider the possibility of not allocating one or both of the GB PDL sites.			

[55] Scenario 1 = the combined capacity of the two GB PDL sites; Scenario 2 = Scenario 1 + 436 + 229; Scenario 3 = Scenario 2 + 522 + 996; Scenario 4 = Scenario 3 + 2,470 + 880.

Harpenden

Land falls within Harpenden Town Parish, Wheathampstead Parish and Harpenden Rural Parish.

As per the discussion presented above under St Albans, Harpenden's position within the settlement hierarchy, aligned with an understanding that there are no headline reasons in support of a very low growth strategy, serves to suggest a clear need to direct a good proportion of the district's overall growth to the town. Harpenden's population is around 40% of the size of St Albans', but there is a good local offer in terms of a town centre and community infrastructure, including four secondary schools. Harpenden is also well-connected by rail with fast and frequent services to London St. Pancras and Luton Airport and St Albans via Thameslink. There is also good access to the M1, but otherwise Harpenden faces challenges in terms of road connectivity and traffic.

When considering reasonable growth scenarios, the 'bottom-up' starting point is supply from:

- Planning permissions - total 142 homes (inc. 5 homes at Annables Lane). This amounts to 10% of the total district-wide figure, which is somewhat low as Harpenden comprises 21% of the districts dwelling stock.
- Windfall – (see explanation above) totals 432 homes.
- Brownfield urban supply – sites are supported for a total of 160 homes (19% of the total proposed urban supply). N.B. four of these sites are existing allocations within the Harpenden Neighbourhood Plan.

These sources of **non-Green Belt** supply total 734 homes.

With regards to **Green Belt** options, the first point to make is that there is a clear strategic argument for Green Belt release at Harpenden, particularly given the need to test the option of not delivering HGC in full. Also, as discussed above, there are arguments for low growth at St Albans, which could increase pressure for growth at Harpenden.

Green Belt options can be placed into a *broad* sequential order of preference:

- A starting point is **North West Harpenden** strategic urban extension (HELAA ref. HT-07-21), which is both recommended for further consideration by the Green Belt Review *and* proposed for a strategic scale scheme (**293 homes**) with the potential for infrastructure benefits. There is an assumption that community facilities to the benefit of the existing and future residents would be provided, including facilities that may enhance the offer of the existing nearby local centre along Luton Road, as well as extensive greenspace and improved cycling connections to the town centre.
- Second, there are 14 **non-strategic HELAA sites** recommended by the GB Review and not associated with any clear barriers to allocation. These sites would deliver **670 homes** in total. Three sites are notably larger:
  - Sites HT-01-21 and WH-02-21 would together deliver 164 homes to the northeast of Harpenden. A recently delivered secondary school is close by but there are access/ transport connectivity challenges.
  - Site HT-21-21 would deliver 95 homes to the south of Harpenden, but there are access and wider transport challenges, plus the Harpenden Conservation Area is adjacent on two sides. The site was previously considered for 131 homes, and it is noted that there is a pending planning application for 35 homes. This site has been discussed as an example of the need for a 'step change' in respect of supporting higher density developments of smaller homes, even where neighbouring areas reflect a low density character.
  - HT-05-21 would deliver 70 homes to the east of Harpenden, utilising the site of a former sewage treatment works. The site is better located in terms of walking access to the town centre and train station, but again access is a challenge, given current access via a narrow lane.
  - Of the smaller sites, one site (HT-22-18) is located in a conservation area (although it is noted that there is an adjacent committed scheme for five bungalows), and another notably constrained site is HT-03-21, where access would be via a narrow lane with a clear historic character, mindful of the adjacent Childwickbury Conservation Area. The site is also constrained in wider transport terms, given a ~3km walking distance to the town centre. The assumed capacity is 43 homes, but there is an argument for a reduced scheme.
  - One other site of note is located adjacent to the west of the Rothamsted Research strategy employment site. Firstly, this site is of note as it only partly intersects a HELAA site, but in practice land availability is thought unlikely to be an issue. Secondly, the site is of note in that it is associated with, and accessed via, a large employment site; however, in practice there is already some housing nearby, and the site would be very well-connected to Harpenden town centre by active modes. Finally, the site is constrained in landscape and heritage terms, given adjacent public rights of way, a former parkland landscape and rising land to nearby Grade 1 listed Rothamsted. The current assumed yield is 55 homes.

- Third, is **North East Harpenden** strategic urban extension, which comprises: 1) a larger northern parcel, where land is not recommended by the GB Review; and 2) a smaller southern parcel where land *is* recommended by the GB Review (HELAA sites HT-01-21 and WH-02-21 discussed above). The site as a whole comprises sites HTWH-1-18 (which includes WH-02-21) and HT-01-21 (a small site).

  There are clear Green Belt sensitivities, including given a weak northern boundary (although the river valley topography could assist with containment to some extent). However, the site is in proximity to a recently delivered secondary school (Katherine Warrington school) and the scheme would deliver a new neighbourhood centre and a primary school. The full strategic scheme would deliver upgrades to Common Lane that would assist with delivering (and potentially enable) the southern parcel, i.e. the parcel that is recommend by the GB Review. The scheme in full would deliver **598 homes** over-and-above the 164 homes at sites HT-01-21 and WH-02-21. It should also be noted that this was a proposed strategic allocation in the previous version of the St Albans Local Plan as withdrawn in 2020.

- The next port of call might be one or both of the following two strategic growth options involving land not recommended for further consideration by the Stage 2 GB Review and overall considered to be sequentially less preferable in comparison to the options discussed above:

  – **Expanded North West Harpenden** strategic urban extension – akin to current planning application 5/2023/0327 for 550 homes (also the proposed allocation in the previous version of the St Albans Local Plan as withdrawn in 2019). An expanded scheme would deliver somewhat limited additional benefit,[56] but would clearly lead to additional concerns from a Green Belt perspective, as the scheme would extend beyond Cooters End Lane, which is a rural lane that forms part of the Chiltern Way long-distance path, albeit an expanded scheme would deliver significant new woodland and greenspace in order to secure a new long-term defensible Green Belt boundary. It is also recognised that road traffic is potentially a constraint to higher growth in this area, assuming a high rate of southbound journeys by car, to and through the centre of Harpenden. However, on the other hand, a location on the strategic road network (i.e. an A-road) is arguably a benefit over NE Harpenden.

  – **East Harpenden** strategic urban extension – would involve developing Aldwickbury Park Golf Club (HELAA site WH-30-21) for 500-1,000 homes. The land benefits from relatively good proximity to the town centre and train station, and Wheathampstead Road appears to be a fairly wide road corridor (albeit a minor road). However, existing trees and woodlands onsite (linked to past landscaped gardens/parkland) are a constraint, as is the topography in the northern part of the site. With regards to Green Belt sensitivity, whilst the site is not 'recommended' by the GB Review, there would be some potential to utilise landscape features for containment, and the possibility of a modest scheme with extensive accessible greenspace (the golf course is not publicly accessible) might be explored.

- **Other options** perform less well, and so can be ruled-out with relative ease, given understanding of the number of new homes that would be needed at Harpenden under any reasonably foreseeable scenario.

  With regards to other land parcels recommended for further consideration by the Green Belt Review, there is no need to go through these systematically (e.g. see St Albans, above), but one site potentially of note is HT-07-21, which in use as a sewage treatment works (N.B. the adjacent older sewage treatment works is one of the 13 'non-strategic HELAA sites recommended by the GB Review' discussed above). It is noted, however, that HT-07-21 is associated with Aldwickbury Golf Course, which is discussed as a rejected strategic urban extension option (WH-30-21). A strategic urban extension could feasibly facilitate relocating the sewage treatment works to a location more peripheral to the town.

  With regards to those non-strategic site options that are not recommended for further consideration by the GB Review, all can be ruled at this stage in the process. One site potentially of note is WH-35-18, which is located adjacent to the north of the Lower Luton Road, east of Harpenden. Whilst the site is not recommended by the GB Review, it is noted that: a recent secondary school is near adjacent to the west, there is a housing estate to the east (Lea Valley) and topography could assist with containment to the north. A small site that is recommended by the GB Review (HT-20-21) is located nearby, and so a modest strategic-scale combined scheme could potentially be considered, also taking-in land between the Lower Luton Road and the River Lee flood zone / priority habitat. There could also be merit to a new primary school in this location. However, it is recognised that the land might alternatively be used for biodiversity / ecosystem service purposes (noting that WH-35-18 has been left to go to scrub).

[56] The site promoters have prepared a website: https://landgharpenden.co.uk/. As well as additional greenspace (including woodland, sports pitches and allotments), an expanded scheme would deliver a large retirement community.

Finally, there is a clear need to note the extensive area of land associated / formerly associated with the Rothamsted Estate (over-and-above the potential 55 home scheme discussed above), between Rothamstead Park and Hatching Green. Land here is clearly sensitive in many respects (Green Belt, Rothamsted Park, Grade I listed Rothamsted on high ground, a former parkland landscape, accessible parkland, accessibility via public rights of way, Hatching Green Conservation Area), plus there is a need to support the future of Rothamsted Research (i.e. not consider growth that would hinder objectives). However, the land here is near adjacent to the town centre and train station (there is no equivalent option, and there is a need to recall the importance of minimising transport carbon emissions), plus the town's key employment area is located here, and there is potentially good road connectivity, given the feasibility of linking to both north-south A-roads. There might also be some potential to draw-up topography to contain a strategic urban extension involving housing growth alongside a reconfiguration of uses, plus it is noted that there is some potential for housing growth at Hatching Green regardless (the GB Review recommends land here for further consideration). This is simply flagged as comparator to preferable options discussed above.

In **conclusion**, there are many feasible growth scenarios for Harpenden, hence there is a need to take a pragmatic approach. A starting point is non-Green Belt supply (734 homes), which is arguably an unreasonably low growth scenario, but which warrants being progressed on balance, in order to minimise the risk of challenge and with a view to ensuring methodological consistency with the approach discussed above in respect of St Albans. Higher growth scenarios can then be identified on the basis of the broad sequential order of preference discussed above (applying a similar logic to that applied for St Albans).

Table C: *Summary of Harpenden scenarios to progress to Section 5.5.*

Scenario		Homes	
		Non-Green Belt	Green Belt[57]
1)	Low growth	734 [Commitments, windfall and urban supply]	-
2)	Scenario 1 plus 14 sites supported by the GB Review		963
3)	Scenario 2 plus strategic growth to the northeast		1,561

Other scenarios?

There are many other scenarios that could feasibly be defined, but there is a need to take a pragmatic approach.

There is an argument to suggest that a reasonable low growth scenario must involve some Green Belt release (as per St Albans, albeit the sites in question at St Albans comprise previously developed land).

Also, there is an argument for further considering one or more scenarios that would involve some but not all of the 14 non-strategic sites supported by the GB Review (there will be the potential to undertake further work to differentiate between these sites subsequent to the consultation, drawing upon consultation responses received).

Under a scenario involving lower growth via non-strategic urban extensions there would then be an argument for additional growth at one or more strategic urban extensions.

London Colney

Land falls within London Colney Parish and Colney Heath Parish.

London Colney is a third-tier settlement (classed as a small town). There is some employment provision and high order services including retail and leisure, but there is currently no secondary school. There is relative proximity to employment locations, including via the M25, but the nearest train station is at Radlett.

The planning context at London Colney is notably different to St Albans and Harpenden. The latter are historic market towns that have expanded organically in a fairly typical fashion, whilst London Colney was historically a modest village associated with the River Colne, prior to extensive (in relative terms) 20th century expansion, including early 20th Century expansion associated with the former Napsbury hospital.

Options for expansion are limited by clear constraints, namely: Napsbury Park/Hospital Conservation Area and Registered Park and Garden (Grade II) to the west, as well as the site of the Government permitted SRFI (along with associated new country parks); the A414 (North Orbital) to the north, as well as the Green Belt gap to St Albans; the A1081 (London Colney Bypass) to the east; and the River Colne to the south, as well as the M25.

[57] Scenario 2 = 293 + 706; Scenario 3 = Scenario 2 + 598.

In this light, there is a strategic argument for considering low growth at London Colney, potentially to involve nil growth over-and-above planning permissions (101 homes, or 7% of the district total, which is in line with dwelling stock); windfall (88 homes); brownfield urban supply (37 homes; 4% of the district total); and two greenfield urban sites identified through the HELAA (78 homes). In total **non-Green Belt** supply is 304 homes.

With regards to **Green Belt** options, the first point to make is that the Green Belt Review does not recommend that further consideration is given to the release of any land parcels around London Colney. On this basis, there is a clear argument for exploring a growth scenario involving no Green Belt release.

However, there is also a clear strategic argument for exploring Green Belt release, particularly given the need to test the option of not delivering HGC (as discussed above), as well as the possibility of moving forward with a low growth for St Albans and/or Harpenden (as discussed above).

Green Belt options can be placed into a *broad* sequential order of preference:

- A starting point is **West London Colney** strategic urban extension (HELAA ref. LC-02-21), where there is the potential for a **405 home** scheme to deliver a secondary school. Specifically, the new homes would be delivered adjacent to settlement edge with the new school to the west, thereby helping to secure a suitably defensible new Green Belt boundary, mindful that the site is bordered to the north by Napsbury Park and to the south by the River Colne floodplain. This was a proposed strategic allocation in the previous version of the Local Plan.
- Beyond this it is difficult to identify further options that might reasonably be taken forward to Section 5.5:
  - The fields adjacent to the north of the town – are not HELAA sites and are seemingly in use as playing fields, whilst land northwest of the town, to the west of Shenley Lane, falls within the Napsbury Hospital Registered Park and Garden (albeit outside the area of parkland shown on the pre-1914 OS map).
  - Land to the south of the town – is constrained by flood risk and then beyond the flood risk zone land (former landfill) is required for the country park associated with the Government-permitted SRFI.
  - The final option is then land to the northeast, beyond the A1081 dual carriageway. Masterplanning an effective scheme would be challenging, given two duel carriageways and a large ancient woodland, but in some other respects the land is fairly unconstrained. Also, there is merit to considering the possibility of growth here in combination with a strategic urban extension to the southeast of St Albans, including as the two combined schemes might support strategic transport upgrades (e.g. to include a new A414 junction) and potentially long-term aspirations for upgrading the A414 to a high-quality public transport corridor. Another consideration is the adjacent Hertsmere border and the proximity of a new settlement option proposed as a preferred option within the draft Hertsmere Local Plan in 2021 (albeit plan-making is currently paused). The location of the site, which is known as Bowmans Cross, can be seen on the key diagram as well as on the promoters website, with built form (~6,000 homes) to the south of the River Colne / Bowmans Lakes, and primarily to the south of Coursers Road (such that there would be a gap to London Colney).

On balance, it is considered appropriate to test the option of **North East London Colney**. A site of approximately 20 ha can be identified (only involving land within St Albans District) such that the site might yield ~480 homes.

In **conclusion**, on the basis of the discussion above there are three reasonable growth scenarios for London Colney to progress to the district-wide growth scenarios (Section 5.5).

Table D: *Summary of London Colney scenarios to progress to Section 5.5.*

Scenario		Homes	
		Non-Green Belt	Green Belt[58]
1)	Low growth	304 [Commitments, windfall and urban supply]	-
2)	Scenario 1 plus strategic growth to the west		405
3)	Scenario 2 plus strategic growth to the northeast		885
Other scenarios? Assuming that the options of expansion to the north and south can be ruled-out, as can the option of further expansion to the west, then the next port of call might be larger-scale growth to the east / northeast.			

[58] Scenario 3 = Scenario 2 + 480.

Redbourn

Land falls within Redbourn Parish.

Redbourn is a fourth-tier settlement (classed as a large village), alongside Wheathampstead (discussed below). There is a village centre with a range of retail and community infrastructure including a GP surgery, and there is a leisure centre at the northern extent of the village. However, there is no secondary school and only one primary school. There is also no train station and limited employment, although Redbourn benefits from good proximity to higher order settlements, with an off-road cycle route (the Nickey Line) to Hemel Hempstead and Harpenden and an hourly bus service to Dunstable and St Albans (19 mins). There is a fairly strong linear historic core along the high street, with valued common land to the west (linking to the Grade I listed parish church) and the River Ver corridor is to the east of the village centre. Redbourn saw quite extensive expansion in the latter half of the 20th century, particularly to the north, with housing growth bringing with it new community infrastructure.

Also, it is important to note that the 12.6 km zone of influence surrounding the Ashridge Woods and Common component of the Chilterns Beechwoods SAC covers the entirety of Redbourn.

When considering reasonable growth scenarios, the 'bottom-up' starting point is supply from: planning permissions (3 homes, which is low given Redbourn's size and position in the settlement hierarchy;[59] windfall (59 homes); and urban supply (7 homes). In total **non-Green Belt** supply is 69 homes.

With regards to **Green Belt** options, the first point to make is that there is a strategic argument for Green Belt release at Redbourn, particularly given the need to consider the possibility of not delivering HGC in full; the need to consider the possibility of supporting lower growth at the three higher order settlement discussed above; and the need to minimise pressure for growth at lower tier settlements.

Green Belt options can be placed into a *broad* sequential order of preference:

- **West of Redbourn** strategic urban extension – comprising HELAA sites R-03-21 and R-06-21 has the potential to deliver 593 homes. The strong performance of this site in Green Belt terms is clear, given hard boundaries around most (but not all) of the site boundary. Also, the scheme could deliver new infrastructure to the benefit of the wider village, potentially to include a primary school (or the scheme might fund expansion of the existing primary school, which is land locked but seemingly benefits from a large site). However, there are inherent access / connectivity challenges and clear constraints, including in the form of the adjacent M1 and several public rights of way. There would be a need to liaise very closely with Dacorum Borough, and it is noted that there is a pending application for 300 homes within the southern half of the site (ref. 5/2021/3631).
- **East of Redbourn** – comprises HELAA site R-18-21, and the current assumed capacity is 68 homes (such that it is classed as a non-strategic site). This is a complex site, with the primary constraint onsite being the River Ver corridor, but there is also a Gypsies and Travellers site and quite extensive mature trees, with a high proportion shown as priority habitat by the nationally available dataset. Access / connectivity is also challenging. However, on the other hand, the site benefits from good proximity to the village centre (much better than West of Redbourn), direct access to the Nickey Line and there is a considerable opportunity to improve access to the river corridor, to the benefit of the village as a whole.
- Moving on to sites not recommended for further consideration by the Green Belt Review, there is a need to consider a possible **North East Redbourn** strategic urban extension. This is primarily on the basis of the site's access and transport credentials, noting direct access onto two good road corridors (including one with bus connectivity) and good proximity to the village centre. Also, there are limited onsite constraints. However, landscape is likely a key constraint, given extensive views over the site to distant wooded ridges. The site is being actively promoted, with the latest proposal being for 825 homes plus new community and green/blue infrastructure (delivery in combination with East of Redbourn could support a comprehensive approach to river corridor enhancements). The proposal would involve a focus of housing growth on raised land at the northern extent of the site, which might be revisited (i.e. the promoters might offer a reduced scheme without compromising on infrastructure). It is also noted that the land is owned by Lawes Agricultural Trust, which is a charity that traces its origin to Sir John Bennet Lawes FRS, who founded Rothamsted Experimental Station.
- Finally, there is a need to note extensive HELAA sites to the north of Redbourn. However, rising land / landscape is a constraint in this area. There is a need to recall the ongoing AONB boundary review.

[59] There has also been very limited housing growth over recent years, as is evident from satellite imagery going back to 2000.

In **conclusion**, three sites have been discussed above, but it is reasonable to rule out North East Redbourn at this stage – i.e. not progress the site to Section 5.5 – given the weight that can and should be attributed to the recommendations of the Green Belt Review. Also, it is the sequentially least preferable site, and delivering it in-combination with the two sites supported by the GB Review would amount to a total growth quantum that is arguably unreasonable for Redbourn, e.g. noting no train station or secondary school, and very limited employment.

The remaining two Green Belt sites might be delivered either in isolation or in combination, and there is an argument for ruling out a 'low growth' scenario involving neither site as unreasonable. However, on the other hand, there is an argument for ensuring methodological consistency with the settlements discussed above, where a scenario involving nil Green Belt release was considered a reasonable scenario to progress. On balance two growth scenarios are progressed to Section 5.5.

Table E: *Summary of Redbourn growth scenarios to progress to Section 5.5.*

Scenario		Homes	
		Non-Green Belt release	Green Belt release
1)	Low growth	69 [Commitments, windfall and urban supply]	-
2)	Scenario 1 plus two sites supported by the GB Review		661
Other scenarios? As discussed, the next port of call would likely be land to the northeast, where there is the potential for a strategic urban extension. Also, there could be a need to consider the option of a reduced scheme to the east, with an increased focus on enhancing the river corridor and woodlands in this area.			

Wheathampstead

Land falls within Wheathampstead Parish.

Wheathampstead is the other fourth-tier settlement (classed as a large village). It is a slightly smaller settlement than Redbourn, with a commensurately lower local offer (although there are two primary schools), and it is also a more rural settlement, with a limited bus service and without easy/safe cycle connectivity to nearby settlements. It is a relatively nucleated settlement, with a strong historic core and with 20th century expansion primarily to the south. The Wheathampstead Neighbourhood Plan explains *"our services hub contains the Parish Council office, Library, Fire Station, Police Office, Doctors Surgery, dentist and sporting facilities all located within a 150m radius."*

When considering reasonable growth scenarios, the 'bottom-up' starting point is supply from: planning permissions (11 homes, which is low given Wheathampstead's size and position in the settlement hierarchy;[60] and windfall (29 homes). In total **non-Green Belt** supply is 40 homes (N.B. no urban supply has been identified).

With regards to **Green Belt** options, the first point to make is that there is a strategic argument for Green Belt release at Wheathampstead, including given very low non-Green Belt supply (also, other arguments set out above, under Redbourn, apply to Wheathampstead).

The starting point is HELAA sites intersecting a land parcel recommended for further consideration by the Green Belt Review. However, none are of a strategic scale. The options are:

- Hill Dyke Road (ref. WH-28-21; 85 homes) – is adjacent to the west of a large scheduled monument and a Local Wildlife Site (LWS); however, access would be achieved from the north, which likely serves to alleviate concerns (albeit access would involve some loss of a hedgerow shown on the pre-1914 OS map). It would be important to integrate well with the adjacent large mid-20th century housing estate.

[60] However, there has been housing growth over recent years and decades, with satellite imagery highlighting: one small greenfield housing site for 28 homes that is nearing completion; a significant housing estate delivered at the northern extent of the village in the early 2000s; and two other small brownfield sites that have delivered new housing over the past ~20 years.

- Amwell Top Field (ref. WH-24-17; 60 homes) – would also involve a southern extension to the village, as per the site discussed above (and mindful that this has been the main direction of village expansion over the decades). Access would be from Amwell Lane, which has a rural character and is likely to be a popular recreational route between Wheathampstead and the historic hamlet of Amwell, where there is a designated conservation area and a pub, as well as to Nomansland Common / Heartwood Forest. The field in question is clearly visible from Amwell Lane (depending on hedgerow height); however, the site is otherwise subject to limited constraint, and the proposal is to develop only the northern part of the site adjacent to Wheathampstead.
- South of Codicote Road (ref. WH-03-21; 12 homes) – is a smaller site located to the north of the village. There is extensive onsite constraint, with most of the site covered by a blanket TPO and priority habitat woodland (according to the national dataset). However, some of the site is relatively open, and closer investigations may serve to identify potential to deliver a modest number of homes whilst retaining and potentially enhancing onsite trees / woodland. According to historic OS maps the site was not wooded until at least 1945, but rather was associated with the adjacent former train station / industry. However, historic satellite imagery may appear to show the site more wooded than is currently the case. There is a current application for retirement living accommodation (ref. 5/2023/0782).
- Highway Chipping Depot, Lower Luton Road (ref. WH-22-17; 7 homes) – is a small site to the north of the village. It gives rise to few concerns on the assumption that new homes would avoid the flood zone.

With next port of call is then North of The Slype, **Gustard Wood** (ref. WH-10-18; 49 homes). This site falls within a land parcel recommended for further consideration by the Green Belt Review but is sequentially less preferable than the sites discussed above. This is because Gustard Wood is a lower tier settlement to the north of Wheathampsteaad, comprising a post-war residential estate delivered within the former grounds of a country house and without any local services or facilities to speak of. Furthermore, housing development would not link directly to the current edge of Gustard Wood due to a small area of priority habitat woodland (also a listed building) associated with the former country house / parkland.

There is also one further land parcel recommended for further consideration by the Green Belt Review; however, this land currently comprises sports and play facilities. The land does relate very well to the village centre, such that the possibility of relocating the facilities (to the east) might feasibly be explored. However, there is no such proposal, and there is no HELAA site intersecting the land parcel.

Finally, with regards to HELAA sites not intersecting a land parcel supported by the GB Review, the only two that warrant mention are two sites to the northeast that might potentially come into contention as part of a coordinated approach to strategic urban extension of the village to the northeast, to include consideration of the aforementioned land currently in use for sports and play facilities.

In **conclusion**, as per Redbourn, on balance it is considered reasonable to progress two growth scenarios.

Table F: *Summary of Wheathampstead growth scenarios to progress to Section 5.5.*

Scenario		Homes	
		Non-Green Belt	Green Belt
1)	Low growth	40 [Commitments and windfall]	-
2)	Scenario 1 plus five sites supported by the GB Review		213
Other scenarios? There may be a need to consider scenarios involving an adjusted package of non-strategic allocations. However, it is difficult to envisage higher growth scenarios, given the characteristics of Wheathampstead and the sites feasibly in contention for allocation.			

Bricket Wood

Land falls within St. Stephen Parish.

Bricket Wood is located at the southern extent of the district and is a 'medium village', along with nearby Chiswell Green, How Wood and Park Street. The village has good accessibility to Watford and St Albans via the Abbey Line (although the service is only every 45 minutes) and there is also very good road connectivity. There is a primary school and also a major employment site within walking distance to the south, namely the Building Research Establishment (BRE).

There is also low historic environment constraint, as the settlement primarily formed in the 20th Century. However, there is limited potential for growth as the village edge abuts or near-abuts strategic transport infrastructure on three sides, plus there is extensive woodland in this area, including ancient woodland (the pre-1914 OS map shows an extensive area of woodland and common land). The village is sensitive in biodiversity terms, including given an adjacent component of Bricket Wood Common SSSI where the condition status is 'unfavourable no change'.

When considering reasonable growth scenarios, the 'bottom-up' starting point is supply from: planning permissions (7 homes, which is very low given Bricket Wood's size and position in the settlement hierarchy;[61] and urban supply (5 homes). There is no windfall assumption, such that total **non-Green Belt** supply is just 12 homes.

With regards to **Green Belt** options, the first point to make is that there is a strategic argument for Green Belt release at Bricket Wood, as per the discussion above under Wheathampstead.

The starting point is HELAA sites intersecting a land parcel recommended for further consideration by the Green Belt Review. However, none are of a strategic scale. The options are:

- North of Oakwood Road (ref. STS-30-21; 74 homes) – comprises the western part of a land parcel between the northwest edge of the village and the M25 / North Orbital (M25 J21a). The adjacent roads are a clear constraint, plus access is a challenge, including given an area of priority habitat woodland / TPOs at the eastern edge of the site. Woodland / heathland creation could be an alternative use; however, it is recognised that land to the east (part of the same field) is proposed for non-housing uses.
- Bucknalls Drive (ref. STS-54-21; 44 homes) – is constrained on account of a LWS designation on three of its four sides, plus Bricket Wood Common SSSI (also open access land) is near adjacent. However, the site itself appears to be subject to limited constraint, comprising a house set within large grounds.
- Ashdale Lye Lane (ref. STS-57-21; 14 homes) – is also constrained in biodiversity terms, although this has been accounted for in the assumed capacity (the site is 2.4 ha in size). Specifically, the great majority of the site is a LWS and TPO, and most of the remaining part is shown as priority habitat by the national dataset. However, the site does benefit from excellent proximity to Bricket Wood train station.

No other land parcels are support by the GB Review; however, there is a need to note two other HELAA sites. Firstly, STS-55-31 is a large site adjacent to the village primary school that benefits from a degree of containment in landscape and Green Belt terms. Secondly, there is a need to consider land to the east of the railway, where there are constraints (woodland and common land), and containment in landscape and Green Belt terms is problematic, but where there is potentially good connectivity to the train station.

In **conclusion**, two scenarios are progressed, as per Redbourn and Wheathampstead.

Table G: *Summary of Bricket Wood growth scenarios to progress to Section 5.5.*

<table>
<tr><th colspan="2" rowspan="2">Scenario</th><th colspan="2">Homes</th></tr>
<tr><th>Non-Green Belt</th><th>Green Belt</th></tr>
<tr><td>1)</td><td>Low growth</td><td rowspan="2">12
[Commitments and urban supply]</td><td>-</td></tr>
<tr><td>2)</td><td>Scenario 1 plus three sites supported by the GB Review</td><td>132</td></tr>
<tr><td colspan="4">Other scenarios?
All of the proposed allocations do warrant further scrutiny. Also, consideration might be given to one of the two of the other HELAA sites discussed as having a degree of merit, e.g. the site adjacent to the primary school.</td></tr>
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[61] However, a 100 home scheme was recently delivered close to BRE. It was the first to be awarded BRE Home Quality Mark.

Chiswell Green, How Wood and Park Street / Frogmore

Land falls within St. Stephen Parish and St. Michael Parish.

This sub-area covers three closely linked medium-sized villages located between the southern edge of St Albans and the M25. There are three primary schools across the area, two train stations on the Abbey Line (at the eastern edge of the area, specifically at Park Street and How Wood) and there is good road, bus and cycle connectivity to both St Albans and Watford. By way of further orientation, there is a distinction between:

- Land to the west of the Abbey Line – this is where the great majority of the built form is located.
- Land to the east of the Abbey Line – where a small proportion of the current built form is located (although this was historically the primary area of settlement), but there is a Government permitted SRFI and associated new country parks. Specifically, the SRFI is set to be delivered to the east of Park Street / Frogmore, with new county parks to the north and south. The SRFI is also set to deliver a new bypass.

When considering reasonable growth scenarios, the 'bottom-up' starting point is supply from: planning permissions (184 homes);[62] windfall (87 homes) and urban supply (27 homes). Total **non-Green Belt** supply is 277 homes.

Given the position of these linked settlements in the settlement hierarchy, taking into account along scale of non-Green Belt supply and also proximity of the Government permitted SRFI, there is less of a strategic argument for Green Belt release than is the case for the settlements discussed above.

However, there is nonetheless a need to consider Green Belt options, as any decision in respect of **Green Belt** release must reflect a balance of both top down (strategic) and bottom up (site specific) factors.

The starting point is HELAA sites intersecting a land parcel recommended for further consideration by the Green Belt Review. However, none are of a strategic scale. The options are:

- Burston Nurseries, North Orbital, How Wood (180 homes over-and-above the planning permission for 80 assisted living apartments and 44 bungalows) – would primarily involve previously developed land (in use as for horticulture) and How Wood local centre is nearby. However, Burston Manor (Grade 2*) is adjacent, as is priority habitat including two LWS. The area was historically associated with the Manor and a series of woodlands, with considerable woodland already having been lost.
- West of Watling Street, Park Street (ref. STS-64-21; 104 homes) – is visible from the A5183 (Watling Street) but is otherwise subject to limited constraint and benefits from good transport connectivity.
- East and West of Miriam Lane, Chiswell Green (ref. STS-38-18; 98 homes) – could provide an opportunity to rationalise the settlement edge in this location, currently associated with a light industrial area, a hotel and a private road (formerly access to Butterfly World, which closed in 2015), also mindful of the nearby Burston Nurseries site. However, the eastern half of the site comprises a blanket TPO.
- Tippendell Lane and Orchard Drive, How Wood (ref. STS-32-18; 51 homes) – is well-contained in built-form terms and benefits from good accessibility to a local centre and Abbey Line stations. However, the site appears to have not been in agricultural production for at least 20 years, and so may have biodiversity value. The site comprises a historic field, such that there are historic field boundaries on all sides. Finally, it is noted that a strong surface water flood channel runs along the road at the southern edge of the site.
- Frogmore Vicarage (ref. STS-08-21; 5 homes) – a heavily wooded site associated with a vicarage adjacent to Grade II listed church. The assumed capacity reflects the onsite constraints.

No other land parcels are supported by the GB Review; however, there are numerous other HELAA sites, with a large proportion of the undeveloped land in this area being promoted for development, even after having accounted for land set to deliver the Government-permitted SRFI and associated country parks.

Notable locations that might feasibly deliver a strategic urban extension are:

- West of Chiswell Green - comprising land between the settlement edge and the former Butterfly World site / Miriam lane (which was created as access to Butterfly World in ~2007). There are two planning applications in this area currently. One is for 391 homes and a new primary school (ref. 5/2022/0927); and one for 330 affordable homes for Key Workers (ref. 5/2021/3194).
- Land surrounding Tenterden House (care home) northwest of M25 J21a – is accessed by a rural lane and, whilst some of the land is clearly degraded, other comprises former gardens / parkland.

[62] 184 homes from permissions (143 at How Wood) is relatively high, amounting to 13% of the district figure, in contrast to 6% of the dwelling stock. However, there appears to have been limited new housing over recent years and decades.

- Land west of Park Street / north of How Wood - which could involve a strategic urban extension to include the West of Watling Street site discussed above.

The latter land parcel could be preferable on account of being best located in transport terms; however, a large area of former landfill, now comprising woodland and a Gypsy and Traveller site, is a constraint.

In **conclusion**, as per preceding sub-areas, it is considered reasonable to progress two growth scenarios.

Table H: *Summary of Chiswell Green, How Wood and Park Street / Frogmore growth scenarios to progress*

Scenario		Homes	
		Non-Green Belt	Green Belt
1)	Low growth	277 [Commitments, windfall and urban supply]	-
2)	Scenario 1 plus five sites supported by the GB Review		438
Other scenarios? There will be a need for further scrutiny of certain of the supported GB sites, particularly in terms of appropriate developable area and, in turn, capacity. Also, further consideration might be given to a scenario involving a strategic growth location comprising land not supported by the GB Review, e.g. west of Park Street.			

Edge of Radlett

Land falls within St. Stephen Parish.

There is one option in this area, namely the option of a northern extension of Radlett (which is in Hertsmere Borough) into St Albans District. Land here is recommended for further consideration by the Green Belt Review and there is the potential to deliver a (modest) strategic scale scheme involving ~274 homes. The northern half of the site (adjacent to Harper Lane) comprises a light industrial area / trading estate, whilst the southern half of the site (adjacent to Radlett) comprises greenfield land. An area of parkland / former parkland associated with Grade II listed Harper House is located to the east.

The site would not relate well to the edge of Radlett, and the nearest primary school would be some way distant, but Radlett Station (with a good service to London St. Pancras) would be under 2km distant, with good footpath connectivity. Furthermore, there is understood to be an opportunity to improve pedestrian / cycle connectivity into Radlett, subject to further discussions with the County Council.

Finally, there is a need to note that there is also a feasible **new settlement** option at Harperbury Hospital, where there has been considerable recent development. However, the site is poorly connected in transport terms, amongst other issues. N.B. this is the primary new settlement option in the district (see discussion in Section 5.3).

In **conclusion**, on the one hand there is an argument for assuming development at the edge of Radlett site as a 'constant' across the growth scenarios (i.e. progress only one option to Section 5.5), recognising that there is both support from the GB Review and the potential to deliver a strategic scale scheme. However, on the other hand, the site is associated with certain drawbacks / challenges.

Table I: *Summary of 'Edge of Radlett' growth scenarios to progress*

Scenario		Homes	
		Non-Green Belt release	Green Belt release
1)	Nil growth	-	-
2)	South of Harper Lane		274
Other scenarios? There will be a need to consider land to the southeast that falls within Hertsmere, although there will be a strong argument for delivering land here as greenspace to ensure a strong / defensible new Green Belt boundary, i.e. avoid the risk of future development creep to the east.			

Summary of sub-area scenarios

Table J presents a summary of the sub-area scenarios defined above and progressed to Section 5.5, focusing solely on the matter of new supply via Green Belt release. In summary,

- Two scenarios for six sub-areas
- Three scenarios for two sub-areas
- Four scenarios for one sub-area

A further overview discussion of the approach taken to arriving at sub-area scenarios is presented in Section 5.4.

Table J: *Summary of sub-area scenarios*

Sub area	Scenarios for new homes via Green Belt release
North and east of Hemel Hempstead	Two scenarios: 740 or 4,750 homes
St Albans (inc. Colney Heath)	Four scenarios: 144, 809, 2,326 or 5,677 homes
Harpenden	Three scenarios: 0, 963 or 1,561 homes
London Colney	Three scenarios: 0, 405 or 885 homes
Redbourn	Two scenarios: 0 or 661 homes
Wheathampstead (inc. Gustard Wood)	Two scenarios: 0 or 213 homes
Bricket Wood	Two scenarios: 0 or 132 homes
Chiswell Green, How Wood and Park Street / Frogmore	Two scenarios: 0 or 538 homes
Edge of Radlett (N.B. Radlett is within Hertsmere)	Two scenarios: 0 or 274 homes