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**Lead Cllr:** Cllr de Kort  
Lead Councillor for Planning  
Policy

# Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations

**Summary:** This report sets out the methodology used to assess potential sites for the Regulation 19 draft Local Plan.

### Report Author(s)

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Appendix	Title
A	<a href="#">Local Plan Site Selection - Proforma Methodology Paper</a>
B	<a href="#">Green Belt Sites Recommended - HGC Proformas.pdf</a>
C	<a href="#">Green Belt Sites Recommended - Broad Location Proformas.pdf</a>
D	<a href="#">Green Belt Sites Recommended - Large Site Proformas.pdf</a>
E	<a href="#">Green Belt Sites Recommended - Medium &amp; Small Site Proformas.pdf</a>
F	<a href="#">Green Belt Sites Recommended - PDL Site Proformas.pdf</a>
G	<a href="#">Green Belt Sites Recommended - Other Site Proformas.pdf</a>
H	<a href="#">Green Belt Buffer Sites Not Recommended to Progress - Part 1 Proformas.pdf</a>
I	<a href="#">Green Belt Buffer Sites Not Recommended to Progress - Part 2 Proformas.pdf</a>
J	<a href="#">Green Belt Buffer Sites Not Recommended to Progress - Green Belt Study Recommended Proformas.pdf</a>
K	<a href="#">Green Belt Buffer Sites Not Recommended to Progress - Chilterns National Landscape Proformas.pdf</a>
L	<a href="#">Urban Sites Recommended - Urban HELAA Proformas.pdf</a>
M	<a href="#">Urban Sites Recommended - Urban Capacity Site Proformas.pdf</a>
N	<a href="#">Urban Sites Not Recommended to Progress - Urban HELAA Proformas</a>
O	<a href="#">Urban Sites Not Recommended to Progress - Urban Capacity Site Proformas</a>

Corporate Vision & Priorities	Wards	Open / Exempt
<ul style="list-style-type: none"> <li>• Combat the climate emergency Including 'key activity' – Progress the Local Plan</li> <li>• Deliver more social housing</li> <li>• Support our local economy</li> <li>• Enhance the District's cultural offer</li> </ul>	All	Open

## 1. Recommendations

1.1 That the Committee notes the information in the report.

### 2. Purpose of Report

2.1. To provide the background and methodology to the site selection process that has been used to inform the site allocations in the Regulation 19 draft Local Plan.

### 3. Background and Context

3.1. The original Site Selection Methodology was agreed by the Local Plan Advisory Group (LPAG), on 14 June 2022. Work on the site assessment was undertaken following this methodology in draft form sufficiently to inform the draft Local Plan Regulation 18 document by June 2023. These draft outcomes were reported to LPAG and Planning Policy & Climate Committee (PP&C) in June and July 2023. This work has now been updated and completed to support the Regulation 19 draft Local Plan. At this stage further information has been included, such as the Strategic Flood Risk Assessment Level 2 that was completed in 2024, further work on Tree Preservation Orders, responses to the Regulation 18 consultation in 2023 etc. As always envisioned, the methodology is fundamentally similar to the original agreed approach, but in taking the work forward some matters of detail have developed and evolved.

3.2. The site selection work is set out in Proformas which have been used to assess each site and are published alongside the Methodology Paper (Appendix A).

3.3. The Local Plan seeks to make the most effective and efficient use of land in the District and has undertaken an extensive and rigorous search for Previously Developed Land (PDL) (also known as 'Brownfield land' in national policy) within existing built-up areas. The approach has been underlain by the concept of 'leaving no stone unturned' in the search for appropriate sites on brownfield land. This extensive search has also included potential PDL opportunities in the Green Belt. However, an insufficient supply of Previously Developed Land led to the requirement to identify sites on Green Belt Land.

#### Potential Sites in Green Belt Locations

3.4. The Housing and Economic Land Availability Assessment (HELAA) published by the Council in 2022 assessed sites submitted to the Council for consideration from 2016 to the Call for Sites in 2021. The purpose of the HELAA was to consider a wide range of potential options for the future supply of housing and employment land through assessing sites with future development potential.

- 3.5. Sites which were not considered to be suitable, available or achievable by the HELAA were excluded from further consideration at this stage as part of the Site Selection process. The HELAA identified that 566 out of 678 sites identified for potential residential use would progress to the next stage of the Site Selection process.
- 3.6. The Council undertook a detailed Green Belt Review in order to understand the impact of potential development in the Green Belt. While the Stage 1 GBR (2013) assessed the entirety of the Green Belt in St Albans against the NPPF purposes, the GBR Stage 2 fed directly into the site selection process. For this reason it was appropriate to undertake a more spatially focussed piece of work with the initial area of search defined by applying a buffer around each settlement inset from the Green Belt, which would assist in encouraging a sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt (as supported by the NPPF). The GBR Stage 2 (2023) assessed sub-areas, with these sub-areas driven by the sites promoted and considered through the HELAA process, along with small sites identified in the previous GBR Stage 2 of 2013.
- 3.7. The outcome of the GBR Stage 2 (2023) was the recommendation of:
- 54 sub-areas for further consideration in isolation – if removed from the Green Belt, these areas are unlikely to result in harm to the wider Green Belt; and
  - 29 sub-areas for further consideration in combination – if removed from the Green Belt in combination, these areas are unlikely to result in harm to the wider Green Belt but one of the constituent sub-areas could not be removed in isolation without resulting in harm.
- 3.8. These recommendations for further consideration are important in site selection and are key elements that inform the Proformas. The GBR Level 2, however, is not the only consideration for site selection and other criteria for suitability for the selection of sites in the Green Belt are part of the process that is set out in the Methodology agreed by LPAG and the Proformas.

#### Potential Sites on Previously Developed Land

- 3.9. The Council carried out a study for the identification of potential sites on brownfield land through an Urban Capacity Study. The sites were identified through a desktop review of maps, aerial photographs and online street photography and in some cases site visits. Sources of sites included under-utilised sites such as garage blocks and car parks, vacant and derelict land and buildings, and public sector land.
- 3.10. There were also sites identified for assessment on Previously Developed Land in the Green Belt.
- 3.11. A further category of sites on Previously Developed Land were those put forward through the Call for Sites that were within the urban areas of the District.
- 3.12. The site selection process applied to sites on Previously Developed Land in urban locations does not need to take into consideration the Green Belt and this is reflected in the Proformas, which are significantly shorter and simpler than the Proformas for Green Belt Sites

#### Site Selection Proformas for Green Belt Sites

- 3.13. Green Belt Sites identified in the HELAA but outside of the GBR buffers were not considered to be suitable due to their less sustainable location and because development on such sites would create holes in the Green Belt, leading to its fragmentation.

- 3.14. In some locations there is more than one HELAA site due to multiple submissions over the course of several Call for Sites between 2016 to 2021. In these cases the most recent submission was considered in the site selection process and included within the Proforma.
- 3.15. The Proformas are designed to analyse each site and present the findings. At the top of each Proforma is a table setting out:
  - A unique proforma site reference
  - The HELAA reference
  - The Green Belt Review (2023) sub-area reference
  - Site address
  - Parish
  - Area in hectares
  - Current land use
  - Proposed use
- 3.16. There are then three maps showing:
  - The Green Belt Settlement Buffer and outcome of the GBR Stage 2
  - Constraints
  - An aerial view of the site
- 3.17. The red line boundary shown on the maps generally accords with the HELAA document.
- 3.18. The Proforma then provides a summary description of the site.
- 3.19. Each site was then assessed in terms of its sustainable development potential which is considered in detail in the Proforma Methodology Paper (Appendix A).
- 3.20. The Proformas then provide a table of major policy and environmental constraints that are set out in the Proforma Methodology Paper (Appendix A).
- 3.21. Finally, there is a qualitative assessment of the site which draws together the Green Belt Review assessment, the major policy and environmental constraints, and any other relevant important information. The Proforma ends with a recommendation that the site either progresses or does not progress.
- 3.22. Some Green Belt sites that were not recommended for further consideration by the Green Belt Stage 2 were recommended to progress by the Proformas due to the location of the site next to a Tier 1, Tier 2 or Tier 3 settlement and the potential of the site to deliver a wide range of significant Economic, Environmental and Social benefits including housing, affordable housing, schools, and a significant scale of sustainable transport improvements and jobs.
- 3.23. Those sites within the Hemel Garden Communities (HGC) area will also support a comprehensive approach to the delivery of HGC including joint work with Dacorum BC to deliver Duty to Cooperate outcomes. As part of the overall HGC programme there are considerable further benefits including supporting delivery of schools, sports and health facilities and around 10,000 jobs across HGC and the Hertfordshire Innovation Quarter.
- 3.24. Some Green Belt sites that were recommended for further consideration by the Green Belt Stage 2 were not recommended to progress by the Proformas due to the following reasons:
  - The site being too small to accommodate 5 or more homes once the site restrictions (e.g. flooding, protected trees) were taken into consideration;

- Where it is considered that a suitable access and transport solution does not have a reasonable prospect of being provided within the Plan period;
- The site having been already developed to the extent that 5 or more additional homes could not be accommodated;
- The requirement to retain the existing use (e.g., children's play area);
- The site having characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District where technical work is being undertaken by Natural England.

### Site Allocations

3.25. The initial draft Site Selection process set out above and in the Appendices lead directly to the draft Local Plan Regulation 18 Site Allocations in 2023. The updated and finalised Site Selection process set out above and in the Appendices leads directly to the draft Local Plan Regulation 19 Site Allocations set out in another report on the Agenda.

#### **4. Alternative Options Considered and Not Recommended**

4.1. The Council could choose not to consider the Site Selection and Site Allocation, which would prevent Councillors having an opportunity to consider this important aspect of the evidence underpinning the Regulation 19 draft Local Plan.

#### **5. Post-Decision Implementation**

5.1. N/A.

#### **6. Implications of Decision**

##### **6.1. Corporate Priorities and Performance**

6.2. Combat the Climate Emergency including 'key activity' – Progress the Local Plan; deliver more social housing and support our local economy.

##### **6.3. Policy Implications**

6.3.1. There are no immediate implications, however the evidence in this report and its appendix is directly informing the emerging draft Local Plan Regulation 19 Publication consultation draft.

##### **6.4. Implications on Resources**

6.4.1. There are no immediate implications.

##### **6.5. Legal & Constitutional Implications**

6.5.1. There are no immediate implications.

##### **6.6. Community Impact**

6.6.1. There are no immediate implications.

##### **6.7. Environmental & Sustainability Implications**

6.7.1. There are no immediate implications.

##### **6.8. Equality & Diversity Implications**

6.8.1. There are no immediate implications.

##### **6.9. Health & Wellbeing Implications**

6.9.1. There are no immediate implications.

**6.10. Risk Management**

6.10.1. None in relation to this report.

**7. Background Papers – Local Government (Access to Information) Act 1985**

<b>Bibliography</b>	<b>Custodian</b>	<b>File Location</b>
N/A	N/A	N/A