

## PPC Questions and Answers –July 2016

Contact Name	Question	<u>Draft</u> Response Notes
<b>QUESTIONER EXPECTED TO ATTEND MEETING</b>		
<p>Cllr David Mitchell,  Chairman, Redbourn Parish Council</p>	<p>1. It was my understanding that prior to submission, officers were going to provide a full explanation of their weighting and scoring system in their site evaluation matrix. However, all we have (in appendix 1, p34 onwards) is a statement that the original evaluation is “appropriate” along with some updates (in appendix 4, p247 onwards). To give an example of the lack of information, why does site 1, the East of Hemel north site in Redbourn Parish, score full marks for ‘Public Transport’ when the nearest stations, Harpenden, St Albans and Hemel Hempstead, are all over 5 kilometres away?</p> <p>2. In Appendix 4, on page 253, it is noted that for access to site 1 “substantial road network upgrades would need to be investigated” including the use of existing country lanes, a new East Hemel Relief Road and improvements to the M 1 junctions. Given the current lack of a proper transport study, it cannot be said with certainty that this can be delivered within the next 15 years i.e. the plan period. By 2031, the plan states there will be several schools at east Hemel as well as, of course, 2,500 houses. This is all highly ambitious. So, is the proposed Local Plan still regarded as achievable and realistic, as required by national planning guidance?</p> <p>3. Press releases by SADC have said that the new Local Pan will mean the loss of 1% of the District’s Green Belt. However, at the last PPC meeting (14th June 2016), in item 15, paragraph 4.10, it stated that the figure was more than double this at 2.17% (287 hectares). Which is the correct figure, and what will the total be once further Green Belt land has been identified for development beyond the plan period, and how much loss of the District’s Green Belt is considered to be acceptable?</p>	<p>1. The full explanation was provided in the original Development Sites and Strategy Options Evaluation (DSSOE) Technical Report. The purpose of current Committee consideration is limited and specific, as explained in the report at paragraph 10.6. This refers to: “ a final check and potential adjustment of the scoring....not envisaged as questioning or altering the relative ranking of the sites, as this had been tested extensively...”.</p> <p>On the specific point made, it is correct that Hemel Hempstead stations are more distant from this location. However the scoring for East Hemel Hempstead relates to the opportunity to create new sustainable and viable bus services connecting with the stations and other facilities given the scale of the site. The scale of residential and employment development provides the numbers of new customers.</p> <p>2. Yes, the SLP is regarded as ‘achievable and realistic’.</p> <p>It is agreed that the scale of the Hemel Hempstead developments requires substantial highway and transport measures, but it is not correct to refer to lack of a ‘proper transport study’. Transport planning is underway and no insurmountable obstacles have been identified to date. The position is set out in detail in the Infrastructure Delivery Plan (IDP) reported at the Committee’s last meeting. Further work will take the position forward in relation to the DLP and Masterplanning.</p> <p>It is correct to identify that the proper measure is that the proposal is achievable and realistic (deliverable), rather than a certain outcome. (NPPF paragraph 182: “ the Plan should be deliverable over its period...” / paragraph 117 “ensure there is a <u>reasonable prospect</u> that planned infrastructure is</p>

		<p>deliverable in a timely fashion”).</p> <p>3. The SLP <i>housing</i> proposals would result in loss of about 1.27% of the District’s Green Belt. This figure was correctly the one referred to in the SLP consultation debate about the need for housing and Green Belt impacts. The balance of the figure quoted is the impact of employment land allocated at East Hemel Hempstead and of the Strategic Rail-freight Interchange (SRFI). This is explained in the PPC Report at the paragraph referred to.</p>
<p>Jonathan Shreeves</p> <p>Hunston Properties Ltd</p>	<p>In Appendix 4 of Item 9, Officers provide “brief additional clarification” for the reasoning behind certain scores in the sustainability matrix.</p> <p>This includes their clarification in respect of “traffic impact” at S5 North West Harpenden and S4 North of St Albans. Officers put particular emphasis on mitigation or the lack of it. In respect of S5 they refer to “developer presentations and other work”. In respect of S4 they refer to “developer presentations” only. Whilst representatives of part of S4, we were not asked to provide any “other work” to demonstrate how traffic impacts might be mitigated. HCC have confirmed they were asked by the Council to comment only on S1, S2, S3 and S5. They also confirmed that they have not yet signed off any mitigation proposal.</p> <p>Q: [A] Why were representatives of S4 not asked to submit detailed mitigation proposals, whilst those at S5 were?  Q: [B] Given that there are no detailed mitigation proposals for S4, why are planning officers (so not highways experts) certain they will not work?  Q: [C] Why are Officers asking Councillors to make decisions on the relative merits of S4 and S5 without detailed mitigation proposals for both sites, and HCC responses to them?</p>	<p>(A) Because S4 is not in the draft SLP and S5 is. The situation is the same for all four of the eight broad locations identified by SKM that are in the SLP and all four that are not. As is appropriate, following the Committee’s, Cabinet’s and Council’s decisions to publish the draft SLP, detailed work has been undertaken with landowners / developers and relevant infrastructure providers on the potential to deliver the development included in the Plan. The results thus far are recorded in the IDP, as addressed at the last meeting. The promoters of all eight potential Broad Locations had the same opportunity to undertake their own work at the landowner / developer engagement stage of SLP work in autumn 2015.</p> <p>(B) The question is misconceived as officers have not said that they are “certain” mitigations will not work. The detail is at Appendix 4 on the report on this Agenda.</p> <p>(C) Because the SLP is a strategic plan dealing with high level matters. However we are aware that detailed transport and other mitigations for all the four Broad Locations are being worked on as part of the DLP and Masterplanning processes.</p> <p>Recognising that the SLP is a high level document, to be followed by the DLP and Masterplanning, HCC officers have agreed in principle the following text for the Examination In Public:</p> <p><i>Draft HCC position statement on transport/highways:</i></p> <p><i>Based on initial transport modelling congestion is identified</i></p>

		<p><i>at various junctions requiring further investigation. Subject to further work/modelling being carried out to establish whether feasible mitigation(s) exist, HCC as Highway Authority will not object to the St Albans Strategic Local Plan.</i></p>
<p>Brian Parker  (question to be read by Jonathan Shreeves)</p>	<p>In Appendix 4 of Item 9, Officers provide “brief additional clarification” for the reasoning behind certain scores in the sustainability matrix.</p> <p>This includes their clarification for why S5 (NW Harpenden) scores 8 out of 10 for “vehicular access and traffic impact”, whilst S4 (N. of St Albans) scores just 3.</p> <p>Officers site HCC’s view from 2009 that S4 is a “congestion hotspot” but fail to mention that HCC considered S5 to be a hotspot, too. The attached document, supplied by HCC in the past few days, confirms that whilst S5 still appears on its latest map of congestion hotspots, S4 does not.</p> <p>Additionally, Officers have been provided with official traffic counts, the most recent of which confirm that over than 2,000 more vehicles pass S5 every day than S4. Thus, even if 500 houses are built at S4 (900 are not needed if the SLP housing target of 436 p.a. is correct), there would still be fewer car journeys at S4 than there are at S5 today.</p> <p>Q: Why, in the fact of all the evidence, is this Committee determined to over-score S5 and under-score S4? Will Members, including those from Harpenden, take this final opportunity to put things right?</p>	<p>The HCC congestion hotspot map supplied by the questioner is appended to the question and answer sheet. It appears to be a dated version. It is noted that Highways Authority information on congestion is under constant review.</p> <p>More relevant and up to date information on this topic is included in recent AECOM Comet traffic modelling work for the County Council. Extracts from the report are further appended (a link will be provided to the whole technical document in due course). This report was referred to in the IDP report at last month’s meeting as ongoing work.</p> <p>Officers do not accept that there has been an over-scoring of S5 or an under-scoring of S4.</p> <p>Overall traffic volumes are not the issue. The issue is the capacity of roads and junctions to cope with traffic and alternatives that exist or could exist to using cars. The Comet model outputs referred to in the appended report does however provide a helpful indication of the relative severity of future congestion on various parts of the A1081.</p> <p>It is useful to remember that as S4 is not included in the draft SLP, there are no opposing questions from residents who do not support S4. Similarly, as S5 is included, there are no questions from developers who do support S5.</p>
<p>Joanne Whitehead Local resident</p>	<p>The Strategic Housing Land Availability Assessment is a very important part of SADC’s evidence base.</p> <p>At Appendix 14 (copy attached for reference), it describes</p>	<p>The SHLAA copy material referred to is reproduced below.</p> <p>No. The SHLAA Assessment comment in 2009 reflects the officer view taken at that time. The assessment reaches the</p>

	<p>S4 (North of St Albans) as “one of the District’s few realistic opportunities for new employment sites” and as having “significant potential for mixed-use development”.</p> <p>In March 2014 PPC agreed to score sites according to their capacity for mixed-use development. The non-residential development did not have to be at any particular scale for a site to be scored as capable of mixed-use development.</p> <p>In November 2015, officers presented PPC with the developers’ presentations. The presentation for S4 showed the site had potential for employment space, shops and cafes, a hotel, a health centre, a community hall and a primary school.</p> <p>Officers did not advise PPC that the presentation on S4 was unachievable. On the contrary, they advised that the presentations provided “helpful confirmation of the realistic assumptions that can be made about delivery and the ‘community benefits’ that can flow from development at the different potential Broad Locations”.</p> <p>Officers now insist that S4 must score 0/5 for mixed use development.</p> <p>Isn’t this zero score driven solely by the desire to maintain the current site rankings?</p>	<p>conclusions:</p> <p><i>Potential benefits of development include local shopping facilities, public open space, a new access to the Porters Wood employment area and possibly new primary and secondary schools, an extension to the employment area and a food superstore</i></p> <p>As a high level view of possibilities, at the time it was reasonable to conclude that it was one of the ‘few realistic opportunities’ to provide new employment land around St Albans (because of its proximity to an existing employment area). In 2009 there was also considered to be potential for a new secondary school and a new food superstore. Matters have moved on considerably since then.</p> <p>The November 2015 quote applied to the helpfulness of landowner / developer engagement work as whole.</p> <p>The DSSOE and SLP approach to employment uses takes an approach in line with the Herts Local Enterprise Partnership Strategic Economic Plan. This supports the view that strategic and sub-regional employment land needs and aspirations would be best met at East Hemel Hempstead. Additionally further SLP work on employment land and premises needs (SLP/DLP Technical Report - Economic Development and Employment Land Evidence) demonstrated that the main need was for strategically located office development and large scale shed premises for which the east Hemel Hempstead sites are most appropriate. East Hemel now also forms part of the Hertfordshire Enterprise Zone.</p> <p>It is important to bear in mind that on the basis of this evidence there are therefore no ‘exceptional circumstances’ required for employment use in the S4 location in the Green Belt.</p>
<p>John Whitehead Local resident</p>	<p>In Item 9, Appendix 4, justification is given for the traffic/access scoring for NW Harpenden. It says:</p> <p>“Developer presentations and other work confirm that local proposals for delivery of access can be achieved. There is</p>	<p>These questions postulate a level of detailed highway planning and design that is not required at Strategic Local Plan stage. This type of detail will be provided as work on the DLP and Masterplanning progresses.</p> <p>That said, the IDP considered by the committee last month</p>

	<p>reasonable secondary access from Ambrose Lane” Please:</p> <ol style="list-style-type: none"> <li>1. Explain precisely the locations and designs of access junctions onto the A1081 Luton Road which it is contended “can be achieved”.</li> <li>2. Has Hertfordshire CC expressly advised SADC that junctions in those locations and of those designs represent safe and suitable access to/from the A1081 Luton Road?</li> <li>3. Explain the proposed location of the “secondary access” and the design of that junction which is considered “reasonable”.</li> <li>4. Has HCC expressly advised SADC that a secondary access in that location and of that design represents safe and suitable access to/from Ambrose Lane?</li> <li>5. Explain where the proposed school is to be located and how it is to be accessed.</li> <li>6. Provide all minutes or other records of advice given by HCC in relation to access to/from NW Harpenden onto the A1081 Luton Road and Ambrose Lane (whether that advice is positive or negative).</li> </ol>	<p>provides information on the landowner / developers own initial proposals. These demonstrate potential solutions. The Highway Authority (Herts CC) is appropriately involved in working up transport solutions for the site.</p> <p>The HCC draft position statement already referred to in answer to a previous question is directly relevant.</p>
<p>David Rankin Local resident</p>	<p>Item 9, Appendix 4 seeks to justify the traffic/access scoring of 8/10 for S5 and 3/10 for S4 which was first put forward in May.</p> <p>In March 2014, PPC agreed that the main factors for consideration are:</p> <p>“Can suitable access to the site be achieved?”</p> <p>“Degree of impact upon road network and potential for measures to mitigate the impact”.</p> <p>It agreed that a “primary information source” for the assessment of these factors would be “discussions with Hertfordshire County Council”.</p> <ol style="list-style-type: none"> <li>1. Has SADC now had comprehensive advice from HCC in relation to this score? If so:</li> </ol>	<ol style="list-style-type: none"> <li>1. The position remains as reported as part of the DSSOE. The Highway Authority has not raised concerns that suggest the site cannot be accessed. The latest position is that set out in answer to a previous question.</li> </ol> <p>HCC do reserve their position on mitigation until further work as part of the DLP and Masterplanning takes place, as is normal. This is an appropriate stance for them to take. Necessary mitigation measures will be investigated and agreed in detail as proposals are worked up.</p> <ol style="list-style-type: none"> <li>2. (a/b) Highways England responded to the Regulation 19 Publication consultation (link to be added). Their advice / position is similar to that of the Highway Authority (HCC). They reserve their final position pending detailed work, but do not raise fundamental objections. (see Agenda Item 10 report - p 333 - to this meeting for a summary and Council</li> </ol>

	<p>(a) does that advice address the two main factors in relation to all 8 Green Belt sites?</p> <p>(b) when was the advice given?</p> <p>(c) please provide the minutes or other records of HCC's advice.</p> <p>2. Has SADC had comprehensive advice from Highways England concerning the degree to which development of each of the 8 Green Belt sites would impact on the Strategic Road Network and what mitigation might be necessary? If so:</p> <p>(a) when was the advice given?</p> <p>(b) please provide the minutes or other records of Highways England's advice.</p>	<p>response). More comment is expected at masterplan and planning application stages, especially on the East of Hemel Hempstead proposals (as they affect the motorway junction). They are directly involved in discussions regarding East Hemel Hempstead.</p>
<p>John Hansen Local resident</p>	<p>In Appendix 4 to item 9, officers say of NW Harpenden</p> <p>"There is a very high capacity to minimise impact upon the road network by measures to mitigate the impact."</p> <p>Brookbanks, highways consultants instructed by the developers of NW Harpenden, have considered various junctions on the A1081 (Infrastructure Delivery Plan, Appendix 8).</p> <p>However, they have not reported any traffic surveys or modelling of the junction at A1081 Luton Road/Park Hill/Nickey Line bridge, which officers correctly describe as a "pinch point" on the road network and which HCC consider to be a "congestion hotspot".</p> <p>Please explain:</p> <p>1. What will be the ratio of flow to capacity of this junction in 2031 and what will the average queue length be, without mitigation?</p> <p>2. What mitigation is proposed to this junction?</p> <p>3. What will the ratio of flow to capacity of this junction be in 2031 and what will the average queue length be, with such mitigation?</p> <p>Given that this junction is a key junction close to NW Harpenden</p>	<p>As indicated in answer to previous questions, that level detail will be worked up as part of the DLP and Masterplanning processes. The latest position of HCC has also been set out in previous answers. The output of the Comet modelling referred to in the IDP and in earlier answers is also relevant here. As previously noted the model provides some indication of the relative severity of future congestion on various parts of the A1081.</p> <p>The pinch point issue as identified is one affecting the continuity of any cycle and pedestrian route improvements that follow the A 1081. It does not relate to general congestion and the capacity of the road for vehicular traffic. The HCC congestion hotspot information (see attachment to the question sheet) refers to the A1081 in the vicinity, not specifically to this junction or bridge pinch-point.</p>

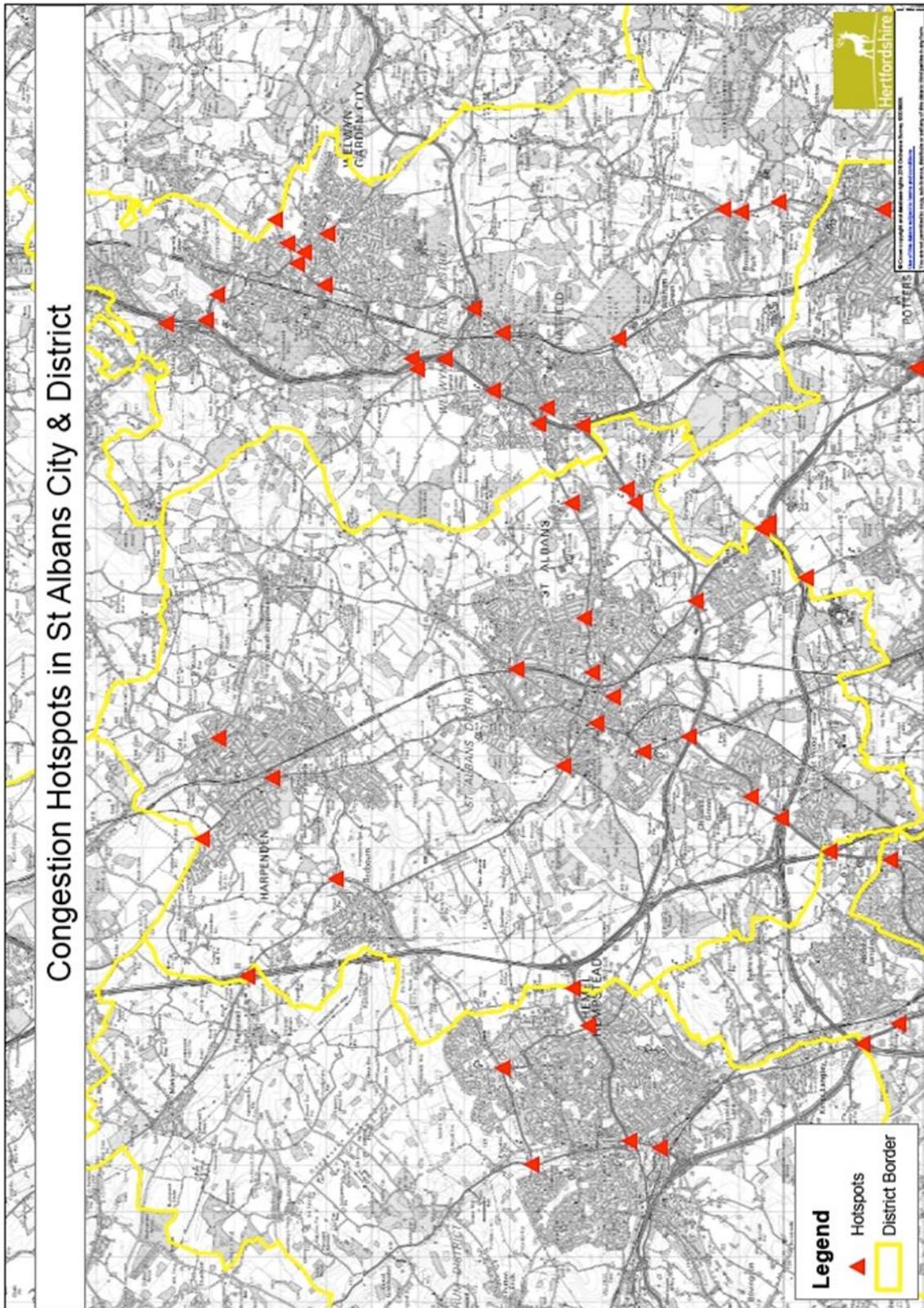
	<p>and a recognised “pinch point”, if the answer to any of the above questions is “don’t know”, how can officers make any judgment at all about the capacity to minimise impact on the road network?</p>	
<p>David Cairns Local resident</p> <p>(Suggests question is read by chairman as it is a covers clarification points arising from question at the last meeting)</p>	<p>In response to a question at the previous meeting the published answer in draft minutes refers to section 9.61 of the IDP quoting:</p> <p>“Officers were asked to work with the County Council to establish if specific education sites should be identified for inclusion. This would need to include giving the Committee an opportunity to assess the demographic evidence base behind such sites”</p> <p>However section 9.61 states:</p> <p>9.61. The Harpenden Secondary Education Trust gained approval from the Department of Education to establish a new secondary school in Harpenden from September 2017. Following detailed feasibility assessments HCC identified the most suitable site for the new school as Land at Lower Luton Road and exchanged contracts with the owners for its purchase on the 15th January 2016. The new school will be built by the Education Funding Authority (EFA) once further studies have been carried out on the site.</p> <p>This is therefore an incorrect reference and, as far as can be seen, the wording given does not appear in the IDP. Can Officers please provide the correct reference and explain how the sentiment stated as being in the IDP is captured within the IDP itself.</p> <p>Similarly the reference to 4.3 is to the covering report and not the IDP itself. The section has two sentences the first of which states:</p> <p>‘4.3 The IDP draws together collaborative research and modelling, setting out the issues and deficiencies that already exist and considering the provision required to support the growth set out in the SLP’.</p> <p>No such issues are included either at 9.61 or in the Limitations section of the IDP itself (Section 4). Should the IDP itself contain clear reference to any substantial unresolved issue such as the need for Very Special / Exceptional Circumstances for the release of Green Belt land as referred to regularly in HCC’s public statements and as yet unresolved by virtue of the designations in DLP having not yet occurred?</p>	<p>The first quote referred to is from the Minutes of the May 2016 meeting of PPC (Item 8 on the Detailed Local Plan [DLP] Indicative Draft). The questioner is correct to say that it is not from the IDP and therefore the reference (not the quote) is incorrect. We apologise for this error in referencing.</p> <p><i>(The published answer reads: “The relevant sentence from 9.61 says...”. It should have read: “The relevant sentence from the minutes of the May PPC meeting say....”)</i></p> <p>The substantive content of the reply to the June question remains accurate (see meeting draft Minutes on the agenda).</p> <p>The IDP is a document recording the current position of infrastructure providers. This is important evidence for the preparation of the SLP and Detailed Local Plan (DLP). The IDP Paragraph quoted in the question (9.61) is correct in that respect and does not need to be changed to reflect the May PPC Minute. That Minute correctly notes the approach being taken to decisions on the content of the DLP.</p> <p>The IDP does record the Education Authority research on future needs (paragraphs 9.34 – 9.66).</p> <p>The Council’s policy response (as Local Planning Authority) to all infrastructure providers’ plans is embodied in its Local Plan proposals (SLP and DLP).</p> <p>On the issue of ‘exceptional circumstances’ for education development that affects the Green Belt, the LPA’s policy is already clearly set out in SLP Policy SLP6.</p> <p>The content of the DLP on education sites is still to be determined and this will be done on the basis set out in the answer last month.</p>

<p>Peter Cook Chair, Colney Heath Parish Council</p>	<p>If the rail freight interchange site becomes available for housing, how would this affect other Green Belt sites, particularly the Broad Locations?</p>	<p>The only way that the rail freight interchange site can “become available for housing” is through the Local Plan process of this Council or a planning application/appeal. The site remains in the Green Belt.</p> <p>The site was not identified as one of the “least worst” eight sites identified by independent consultants in their Green Belt review. Therefore it has not been identified in the SLP.</p> <p>Permission was granted for the rail freight interchange by the Secretary of State. This was given, in simple terms, on the basis of national need for that specific type of facility and lack of alternative sites; which therefore created ‘very special circumstances’. Whilst any potential future planning application would be treated on its merits in the same way as anywhere else, clearly the same national justification could not apply.</p> <p>Therefore, at this point in time, it is unknown how realistically the site could “become available for housing”. Any impacts on other Green Belt locations are also therefore unknown and only hypothetical at this point.</p>
<p><b>QUESTIONER NOT ATTENDING MEETING – ANSWER REQUESTED IN ABSENCE</b></p>		



Attachments:

1. Copy of historic HCC congestion hotspots map supplied by Mr Shreeves for his question



2. Copy of extracts from SADC SHLAA 2009 supplied by Ms Whitehead for her question

**Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search**

around 750 homes at Smallford. Most of the key landowners are acting as a consortium and are working on possible development options for their land.	Road/Oaklands Lane junction would be required and possibly other measures.
<b>Distance to local facilities</b>	
Approximate distance to primary school	Colney Heath – 1.2km
Approximate distance to secondary school	Beaumont – 1.7km (Nicholas Breakspear RC – 1.2k)
Approximate distance to bus routes	Hatfield Road – 50m
Approximate distance to publicly accessible amenity space	Oaklands Lane – 100m
Approximate distance to convenience retail	Station Road – 50m
<b>Conclusion: There are some clear advantages to developing here. In particular, the land is not open countryside and there are large intrusive structures and elements of previously developed land. However, it is very important to protect the narrow Green Belt gap that separates St Albans and Hatfield and avoid coalescence. It seems that most of the potential land will not be brought forward for housing development, unless the Council accepts large scale development, which would urbanise Smallford and reduce the perception of countryside between the settlements.</b>	

**Area of Search 7 – North of St Albans**

This area of search covers farmland to the east of Harpenden Road (rear of Texaco filling station), west of the railway line and north of the Porters Wood employment area. Most of the area is owned by St Albans School.	
The site could accommodate 600-1,000 homes. It could also provide local shopping facilities and possibly a food superstore, a primary school and an extension to the Porters Wood employment area.	
<b>Positives</b>	<b>Negatives</b>
Depending on the precise extent of new development, the Green Belt gap between St Albans and Harpenden would either be maintained or reduced by only a small amount.	Development would involve the loss of attractive unspoilt countryside, with some long distance views. Screen planting would be required to mitigate this harm.
Currently, road access to Porters Wood employment area is poor, but the development would provide a new, improved access from Harpenden Road.	Might add to traffic congestion at the Ancient Briton and King William IV junctions – but it appears that the development would fund improvements to these junctions.
Could accommodate an extension to the Porters Wood employment area – this is one of the District's few realistic opportunities for new employment sites.	Space should be allowed to retain Porter's Wood.
Located close to frequent bus services	

**Appendix 14 – Summary of approach to assessing capacity on the Eight Areas Of Search**

on Harpenden Road and there may be scope for a new local bus route into the city centre.	
Could accommodate a new food superstore, if the Council decides that this would be appropriate.	
Would provide new local shopping facilities and some landscaped public open space.	
Could meet the identified need for a new secondary school to serve the north of St Albans. Could also accommodate a new primary school.	
The likelihood of housing being built is high, as both the landowners are working on possible development options for their land.	
<b>Distance to local facilities</b>	
Approximate distance to primary school	Margaret Wix – 500m
Approximate distance to secondary school	Townsend – 500m
Approximate distance to bus routes	Harpenden Road - 50m
Approximate distance to publicly accessible amenity space	Beech Road - 800m
Approximate distance to convenience retail	Beech Road – 800m
<b>Conclusions: There would be an adverse impact on attractive Green Belt countryside. However, this area has significant potential for residential or mixed use development. Potential benefits of development include local shopping facilities, public open space, a new access to the Porters Wood employment area and possibly new primary and secondary schools, an extension to the employment area and a food superstore.</b>	

**Area of Search 8 (south east part) – North of Harpenden, Luton Road/Ambrose Lane**

This site consists of an agricultural field, bounded by Luton Road, Cooters End lane, Ambrose Lane and the rear of the properties in Bloomfield Road. About 300 homes could be accommodated.	
<b>Positives</b>	<b>Negatives</b>
The site is well related to the existing built up area and the landscape quality is not high.	Traffic impact – the A1081 Luton Road is congested. Further consultation needed with Hertfordshire County Council and Hertfordshire Highways, but the principle of housing development is unlikely to be ruled out on traffic grounds.

1. Notes on / extracts from AECOM Report for HCC on Comet Model findings (circulated as a separate paper)