

# **WHAT'S WRONG WITH THE SITES EVALUATION?**

Harpenden Green Belt Association

# INTRODUCTION

- Planning officers of St Albans District Council carried out a “Sites Evaluation” to decide which sites should be taken out of the Green Belt.
- The Evaluation scores the eight “strategic” sites against a number of different criteria, for example “landscape” or “vehicular traffic and access”. Scores are sometimes out of 5, sometimes out of 10. The higher the score, the “better” for development and the more likely the site is to be taken out of the Green Belt.
- The Harpenden Green Belt Association thinks that the Evaluation is badly flawed, based on wrong or out of date information and full of inconsistencies. In this slideshow we explain some of the issues.
- Question 7 of the Council’s consultation asks respondents whether they agree with the approach taken in the Sites Evaluation. **HGBA is asking its members to say that they STRONGLY DISAGREE with the approach taken.**

# HOW THE SITES EVALUATION WAS COMPILED

1. At its meeting on 4 March 2014, the Council's Planning Policy Committee (PPC) agreed a methodology for the Evaluation put forward by officers.
2. For PPC's 1 May 2014 meeting, officers produced a draft of the Evaluation.
3. Comments on the draft were invited from members of the public, developers and interested organisations. HGBA as well as Harpenden Town Council submitted comments on the two Harpenden "strategic" sites.
4. The final Evaluation was produced to PPC's 3 July 2014 meeting and formed the basis for the recommendation that four sites should be released from Green Belt, namely
  - East of Hemel Hempstead North ("Site S1")
  - East of Hemel Hempstead South ("Site S2")
  - East of St Albans ("Site S3")
  - North West of Harpenden ("Site S5")
5. You can view all the relevant documents on the HGBA website.

# FLAW 1: FAILURE TO REFLECT GREEN BELT PURPOSES

- The Green Belt Review assessed the extent to which the eight “strategic” sites fulfilled Green Belt purposes.
- The PPC agreed that the Evaluation would be taken together with the outcome of the Green Belt Review when deciding which sites to take out of Green Belt.
- In the final Evaluation, however, the officers completely ignored the extent to which the sites fulfilled Green Belt purposes. They gave no weight at all to these purposes in their recommendations.
- The result is that the sites recommended for building are four of the five sites which scored best for Green Belt purposes in the Review.

## FLAW 2: FAILURE TO DO WHAT THEY AGREED TO DO

- Planning officers compiling the Evaluation failed to follow the methodology which had been approved by PPC, on their recommendation, in March 2014.
- One example – of which more later – is that the officers did not measure distances in the way that PPC said they should.
- Another example is that they said that they would have “*detailed discussions with Hertfordshire County Council*” as highways authority, before scoring the sites on vehicular access and traffic grounds. They didn’t.

## FLAW 3: FAILURE TO MEASURE DISTANCES CORRECTLY

- In order to evaluate whether the sites were in a “sustainable location”, the Evaluation assessed how far each site is from various facilities, such as schools or supermarkets. Both the Harpenden sites (NW and NE Harpenden) were scored as good for development on the grounds that they were within walking distance of local facilities.
- But officers did not measure the distances in the correct way. As a consequence, they massively understated the distances people would have to walk.
- When the draft Evaluation came out, HGBA, Harpenden Town Council and others all pointed out to the Council that they had got the measurements wrong. These comments were ignored and the erroneous distances were replicated in the final Evaluation.
- When the Chairman of HGBA asked a public question about these errors, planning officers said that they had corrected all the errors pointed out to them. This was not true.

## FLAW 4: INTERNAL INCONSISTENCY

- The Evaluation manipulates the scoring of sites by taking different areas of land for the purpose of different scores.
- So, for example, for some purposes the NW Harpenden site is taken as including land to the north of Cooters End Lane.
- For other purposes, the NW Harpenden site is taken as only the land between Bloomfield Road and Cooters End Lane.
- This “chopping and changing” enables the Council to inflate the scoring to make the site look best for development each time – but they are not being consistent in the land they are scoring.

## FLAW 5: INCONSISTENCY WITH PREVIOUS EVALUATIONS

- The conclusions in the Evaluation are sometimes the exact opposite of previous similar evaluations.
- For example, in 2009 the Council was considering the south part of the NW Harpenden site for 300 homes. It asked Hertfordshire County Council, as the highways authority, about traffic and access issues.
- In the 2009 assessment, based on HCC's comments, the Council said that the problems of traffic and access were a disadvantage of building 300 homes on the site.
- Now, in 2014, the Council are relying upon exactly the same comments from the highways authority, made in 2009. But this time it has reached the opposite conclusion, namely that the site scores extremely highly (9/10) (i.e. good for development) on "traffic and access" grounds, for building 500 homes.



## FLAW 6: REFUSAL TO HAVE REGARD TO EVIDENCE

- The Council invited comments on the draft Evaluation, but in fact it refused to consider any evidence put forward by the public which cast doubt on the conclusions it had already reached in the draft.
- For example, in its submissions on the draft Evaluation, HGBA provided the Council with a report by highways consultants for Hertfordshire County Council about the NW Harpenden site. This discussed the significant problems of access to the site, including congestion along the Luton Road, the risk of traffic backing up along the Luton Road, and the inability of country lanes around the site to take any further traffic.
- You can view a copy of the relevant extract from the report on the HGBA website.
- The report was simply ignored.

# FLAW 7: THE EVALUATION ASSUMES THE IMPOSSIBLE – SLIDE 1

- The Council has scored the NW Harpenden site on the basis that:
  - There will be a new primary school on it – this gives it a high score for “sustainable location”
  - The listed building will be protected – this gives it a high score for “heritage and archaeology”
  - The new houses will be accessed via a new roundabout at Roundwood Lane – this gives it a high score for “vehicular access and traffic”
  - There will be 40% of the Site available for “strategic infrastructure”, including the new school and public open space
  - There will be 500 new homes on the remaining 60%, at a density of 40 dwellings per hectare – this enables the Council to claim that they can meet their target of 9,000 homes by using only four “strategic” Green Belt sites, at an acceptable density.
- It is impossible to achieve all of these things. The site is too small, and you physically cannot access the northern part from a new roundabout on the Luton Road at Roundwood Lane.

## FLAW 7: THE EVALUATION ASSUMES THE IMPOSSIBLE – SLIDE 2

- When the Council was challenged about this, they changed the goalposts. They said they will cram in more houses by putting all the infrastructure, including a school and public open space, on land owned by the same developer – a huge tract of Green Belt land to the East of the site.
- BUT:
  - This additional land is not shown in the consultation paper, so residents aren't being consulted on these plans
  - The additional land is land which the Green Belt Review advised was particularly sensitive and ought to stay in the Green Belt – it can't stay in the Green Belt if a school is built on it
  - The Evaluation has not evaluated the site on the basis that this additional land will be used. For example, no consideration has been given to how it will be accessed, the impact on the road network around it or how use of this additional land will change the landscape (it's in a landscape conservation area).

# WHAT CAN I DO?

Question 7 of the Local Plan consultation asks whether you agree with the approach taken in the Evaluation.

1. Tell the District Council that you **STRONGLY DISAGREE** with the approach taken, because
  - The Evaluation has ignored the extent to which each site contributes to Green Belt purposes.
  - The Evaluation has not fairly, accurately or consistently assessed the sites. Make as many comments as you feel able to. You could use some or all of the examples given in this slideshow.
2. Look at the Evaluation of the two “strategic” Harpenden sites on the HGBA website. Do you agree with the way they have been scored? Do you have other evidence to show that the Council has got things wrong? Tell the Council what you think in the comments box for Question 7.